



R04-18-A-069

November 13, 2017

Ms. Barbara Alfano  
Brownfield Administrator  
Environmental Protection Agency, Region IV  
Atlanta Federal Center  
61 Forsyth Street, SW 10<sup>th</sup> Floor  
Atlanta, Georgia 30303-8960

RE: Catawba Regional Council of Governments, South Carolina  
FY2018 Brownfields Assessment Coalition Grant Application for Chester, Lancaster,  
Union, and York Counties, South Carolina

Dear Ms. Alfano:

The Catawba Regional Council of Governments is an association of South Carolina local governments in Chester, Lancaster, Union and York counties. Created in 1970, we serve as a forum for intergovernmental cooperation and as a central staffing resource for land use and transportation planning, community and economic development, workforce investment, GIS mapping, information systems, and project management. Thus, we see the needs in our communities, some of which have been severely negatively impacted by the decline of the textile industry in South Carolina. While some of our region has seen recent economic and population growth as a result of the expansion of the Charlotte urban area into South Carolina, our many small communities outside of this higher-growth area struggle with vacant mill properties while simultaneously facing revenue challenges from declining populations and the loss of employment opportunities. We hope to help these communities assess the environmental conditions of the many mill properties that we have across the region with funding from this grant.

- a. APPLICANT IDENTIFICATION: Catawba Regional Council of Governments  
215 Hampton Street  
Suite 200  
Rock Hill, South Carolina 29730
- b. FUNDING REQUESTED:
  - i. Grant Type: Assessment
  - ii. Assessment Grant Type: Coalition
  - iii. Federal Funds Requested: \$600,000
  - iv. Contamination: Hazardous Substances \$500,000/Petroleum \$100,000
- c. LOCATION: Chester, Lancaster, Union, and York Counties, South Carolina
- d. PROPERTY INFORMATION: N/A

e. CONTACTS:

- |   |   |
|---|---|
| i. Project Director<br>Robert Moody<br>Senior Planner<br>Catawba RCOG<br>215 Hampton Street, Ste 200<br>Rock Hill, SC 29730<br>Ph. (803) 327-9041<br>Fx. (803) 327-1912<br><a href="mailto:rmood@catawbacog.org">rmood@catawbacog.org</a> | ii. Chief Executive<br>Mr. J. Randall Imler<br>Executive Director<br>Catawba RCOG<br>215 Hampton Street, Ste 200<br>Rock Hill, SC 29730<br>Ph. (803) 327-9041<br>Fx. (803) 327-1912<br><a href="mailto:rimler@catawbacog.org">rimler@catawbacog.org</a> |
|---|---|

f. POPULATION:

- i. Chester County - 32,708; Lancaster County - 79,515; Union County - 28,329; York County - 235,285
- ii. The Catawba Regional Council of Governments is a Regional Council of Governments.
- iii. None of the 4 counties have had a 20% or greater poverty rate since 1990.

g. REGIONAL PRIORITIES FORM/ OTHER FACTORS CHECKLIST: Attached

- h. LETTER FROM THE STATE OR TRIBAL ENVIRONMENTAL AUTHORITY: Ms. Daphne Neel, Bureau Chief for the South Carolina Department of Health and Environmental Control's (SCDHEC) Bureau of Land and Waste Management, issued a letter acknowledging this grant proposal and the Department's support of the planned coalition assessment activities for the Catawba Regional Council of Governments. The SCDHEC letter is included as an attachment.

We are committed to the success of this program and the redevelopment of brownfield sites within our region. Thank you for your time and consideration. If you should have any questions, please do not hesitate to contact me at (803) 327-9041.

Truly yours,



J. Randall Imler  
Executive Director

## Appendix 3 - Regional Priorities Form/Other Factors Checklist

Name of Applicant: The Catawba Regional Council of Governments, South Carolina

### Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s): Assistance to Communities that Have Limited In-House Capacity to Manage Brownfields Projects

This coalition application targets struggling former mill towns running along the southern and western areas of our region including Chester, Clover, Jonesville, Union, Lockhart, Chester, Great Falls, Lancaster and Kershaw. These are small local governments in need containing mill properties that are blighting their communities.

Page Number(s): 1 and 2

### Assessment Other Factors Checklist

Please identify (with an **X**) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	
The jurisdiction is located within, or includes, a county experiencing "persistent poverty" where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	X, P.11
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	



November 10, 2017

Barbara Alfano  
Region 4 Brownfields Coordinator  
United States Environmental Protection Agency  
Resource Conservation and Restoration Division  
61 Forsyth Street SW  
Atlanta, Georgia 30303-8960

RE: EPA Brownfields Coalition Assessment Grant  
Catawba Regional Council of Governments, South Carolina

Dear Ms. Alfano:

The South Carolina Department of Health and Environmental Control, the State's environmental authority, acknowledges and fully supports the Catawba Regional Council of Government's application for a Brownfields Coalition Assessment Grant. The grant will facilitate assessment of numerous former Mill Sites in the COG region within the central upstate of South Carolina.

The Department appreciates your consideration of the application and hopes for a favorable outcome. Your positive response will assist the COG in its efforts to revitalize properties in the community. If you have any questions or need additional information, please contact Robert Hodges of my staff at (803) 898-0919.

Sincerely,

A handwritten signature in cursive script that reads "Daphne Neel".

Daphne Neel, Chief  
Bureau of Land and Waste Management

cc: Liz Basil, Midlands EA Columbia  
Robert Hodges, Brownfields Program

## 1. COMMUNITY NEED

### 1.a. Target Area and Brownfields

#### 1.a.i. Community and Target Area Descriptions

**Catawba Regional Council of Governments (COG)** is an association of South Carolina local governments in Chester, Lancaster, Union and York counties. Created in 1970, the COG serves as a forum for intergovernmental cooperation and as a central staffing resource for land use and transportation planning, community and economic development, brownfields technical assistance, workforce investment, GIS mapping, information systems, and project management. Since 2007, the COG has also served as the fund manager for the South Carolina Department of Health and Environmental Control (DHEC)'s statewide EPA Brownfields Cleanup Revolving Loan Fund. In 2015 the Census Bureau estimated a total population of 382,020 for our four counties. This area contains 22 municipalities and the Catawba Indian Nation, a federally recognized tribe with a reservation in eastern York County. Historically a region of inexpensive labor and ready supply of waterways made it an ideal location for textile mills in the early 1900s. With the coming of the railroads, mill communities multiplied across the region driving economic expansion and job growth – peaking in the 1970s. The mill was often the center of these communities with the company providing many commercial and public services such as utilities, housing, banks, and stores. As the nation's economy shifted away from manufacturing, the mills declined rapidly throughout the 1980s, 1990s, and 2000s and many closed. Most of the region's recent economic and population growth is a result of the expansion of the Charlotte, NC, urban area directly to the north. This growth is centered in northern York and Lancaster counties close to I-77. Still, many of the small communities outside of these higher-growth areas struggle with vacant mill properties, while simultaneously facing revenue challenges from declining populations as workers and their families move to these faster-growing job markets. Catawba COG worked with communities in need across the region to identify former mill properties blighting the prospects of local economies. We found a band of struggling former mill towns running along the southern and western areas of our region, including Chester, Clover, Jonesville, Union, Lockhart, Great Falls, Lancaster and Kershaw. These towns and cities share a common economic and cultural history. During interviews, residents of these communities identified brownfields, particularly the blighted former mill properties, as significant impediments to the well-being and redevelopment of their community. Therefore, the Target Area for this application will be this band of former mill towns, identified by 13 census tracts (see demographic table). The Target Area includes 53,301 residents in 2015 - just under 15% of COG region's total population (2015 ACS US Census). Yet, this area is estimated to contain 80% of the region's brownfield sites according to the Textile Mill Redevelopment Guide prepared for the area.

#### 1.a.ii. Demographic Information and Indicators of Need

While the Catawba COG Region as a whole compares well with State averages for educational attainment, poverty, median home values, income, and similar demographic and economic indicators, a more granular analysis using a Geographic Information System (GIS) reveals a different story. In our region there is a sharp divide between our Target Area of rural, former mill towns now impacted by brownfields and the northeastern portion, which benefits from the neighboring Charlotte Metropolitan Area growth and expansion. Communities in the Target Area have had difficulty retaining workers and their families after the closure of the mills. The struggle continues. From 2010 to 2015 population in the Target Area declined by 1%, while the region outside the Target Area grew by 11% over the same period (2010 - 2015 US Census Data). Many of those that remain are disadvantaged. Per capita income for the Target Area is just over \$12,000 – less than half that of the COG Region and the State. Nearly one in every three families with children in the Target Area have incomes below the poverty level, and over 20% of households receive Food Stamp/SNAP assistance. This population includes a higher level of minority representation (37% vs. 27% for the region) and lower educational attainment – only 11% of

adult residents hold Bachelors or higher degrees vs. 25% for the region. In addition, the Target Area suffers from low property values. The median home value in the Target Area is approximately \$96,000 vs. nearly \$160,000 for the region. These small communities in the Target Area lack the tax revenues needed to deal with the large demolished industrial properties on their own – an unfortunate legacy of their past.

### Demographics for Catawba COG, South Carolina

ACS 2015 5-year Estimate Data, Census.gov (Retrieved September 2017)

Demographic	Target Area*	COG Region	South Carolina	United States
Population	53,301	382,020	4,777,576	316,515,021
Percent Minority (Alone)	36.9%	27.0%	32.8%	26.4%
Percent African-American (Alone)	33.9%	22.3%	27.5%	12.6%
Percent Hispanic (Alone)	2.1%	4.3%	5.3%	17.1%
Percent Children (5 -under)	6.6%	6.2%	6.1%	6.3%
Percent Elderly (65-over)	14.7%	14.5%	15.2%	14.1%
Percent Women of Child Bearing Age	22.7%	24.0%	23.8%	24.1%
High School Graduate or Higher	77.0%	85.8%	85.6%	86.7%
Bachelor Degree or Higher	11.4%	25.1%	25.8%	29.8%
<b>Economic Statistics</b>				
Individuals Below Poverty Level	25.4%	16.3%	17.9%	15.5%
Families with Children Below Poverty	32.1%	19.4%	22.0%	18.0%
Per Capita Income	\$12,226	\$25,339	\$24,604	\$28,930
Households with Food Stamp/SNAP	22.6%	14.1%	15.1%	13.2%
Median Household Income	\$34,763	\$51,309	\$45,483	\$53,889
Unemployment Rate	7.0%	6.1%	9.5%	8.3%
Median Home Value	\$96,452	\$157,018	\$139,900	\$178,600
Percent Vacant Homes	15.9%	10.1%	16.5%	12.3%
Percent Rental Homes	28.3%	24.8%	31.4%	36.1%

\*Comprised of 13 Census Tracts: 102, 105, 107, 201, 203, 210, 304, 308, 309, 616.01, 617.05, 618.01 & 618.02.

#### 1.a.iii. Brownfields and Their Impacts

Catawba COG staff with support from Community Development Block Grant (CDBG) funding held 14 public meetings with members in the Target Area between 2016 and 2017. Over 250 people attended these meetings, and the problems associated with the legacy textile mills and brownfield properties were repeatedly discussed. These meetings and subsequent outreach in preparation for this grant proposal identified the following brownfield sites of concern to residents in the Target Area that are considered top priorities for assessment activities.

- **Eureka Cotton Mill** (Chester County) – The Eureka Cotton Mill (29 acres), located prominently at one of the major entrances to the City of Chester, was a spinning facility constructed in the early 1900s. After being acquired as a distressed property, the owner demolished the mill, took the good heart pine flooring and recycled the metal. The County shut down operations when they caught him burying asbestos on site. The property has since been transferred to Paulette Birkner (see access letter). The site is overgrown, contains partially demolished buildings, and is a place of rampant criminal activity. The most shocking case was in December 2014, when a community leader was gunned down near the mill not a mile from his home. While no environmental assessment has been done, we know asbestos is present. We anticipate widespread PAH contamination from the burning of coal to power the mill, solvents used for degreasing and cleaning machinery, and chlorinated solvents from spot dry cleaning of fabrics. We also suspect PCBs from abandoned transformers. The property is adjacent to residential (front and back) and commercial properties. With the nearest resident only 30 ft. away from the mill, the site poses a safety and health hazard to the community. The property has rail access and utilities suitable for an industrial site. One developer has expressed interest in the site (letter provided), “if the environmental status of this property were to be defined.”

- **Jonesville Mill** (Union County) – Located in the Town of Jonesville, contamination at this demolished mill includes primarily PAHs from burning coal. The site holds standing water (a habitat for mosquitoes), and the town had a case of the West Nile Virus – a concern being managed by the DHEC. Views on potential reuse of the site vary from an amphitheater for community events to multi-family affordable housing. Grant funds for community visioning and assistance are definitely needed with cleanup planning.
- **Republic Mill #1** (Chester County) – The mill was built in 1910 in Great Falls. The plant was surrounded by a mill village (nearest current residence is 150 ft from the site), and the company operated a large company store that accepted company script and sold everything from sugar to coffins. The mills remained in operation as a major employer in Great Falls until 1979. Mill #1 (12.2-acres) burned and is now rubble. Contamination is most likely, common mill contaminants such as PAHs from burning coal, heavy metals from dyeing, solvents from degreasing and possible spot dry cleaning, and petroleum – but the chief concern is the “green hole”. In an October 30<sup>th</sup> community meeting residents said that workers dumped chemicals in the hole behind the plant including varsol. Several unmarked 55-gallon drums are said to remain on the property. The Great Falls Police Chief, Steven Rice, reported the police have responded to 200+ calls for nuisance and criminal activity since the mill was demolished. Brenda Fort, a Great Falls resident, noted that runoff from the site flows directly into the nearby Catawba River and cited vagrants, rats, and unwanted activities. The property is believed to be in bankruptcy with the mortgage being held by a bank in Milledgeville, GA. The Forfeited Land Commission refuses to take title for failure to pay back taxes and are fearful of environmental liability. The site needs a Phase 1 and likely an extensive Phase 2 Environmental Site Assessment (ESA) to investigate the “green hole”. Residents want the blight and dilapidated structures removed. The 2007 Great Falls *Community Master Plan* developed with input from business owners, residents and local leaders included the redevelopment of the Republic Mill as a top priority. The site is also located next to the proposed welcome center for a new State Park.
- **Buffalo Mill** (Union County) – Construction on the mill began in 1900 and eventually contained the main mill, office complex, power house, ice factory, warehouse, store and bank. The surrounding mill village consists of over 150 homes, a school and a baseball field – all adjacent to the brownfields site. Portions of the site are owned by Union County, but the remains of the main mill are in private ownership. A Phase 1 ESA identified numerous concerns: PCBs - transformer areas with a report of one exploding and hydraulic lifts; machine shop oil and solvents; weaving looms cleaned by spraying with solvents in courtyard; limited dyeing of fabric – heavy metals; drum storage areas and ASTs – petroleum and many possible contaminants in drums; asbestos; and lead paint. The property (9.6 acres) requires a Phase 2 ESA. Residents, living as close as 300 ft away, requested that Catawba COG seek funds for the cleanup of the site to help revitalize their rural community (the unincorporated Town of Buffalo). At the October 27 community meeting, one resident expressed concerns that runoff from the mill debris goes into the Buffalo Creek alongside the property. In addition, lights have been noted in the remaining building’s towers at night, and community members living near the property suspect criminal activity. Small children have been seen playing around the towers during the day, and residents fear they may fall into the hazardous tunnels that run below. In addition to these safety concerns, the site harbors rodents and other pests. The site is adjacent to HWY 215 – a blight on a key artery in Union County. The county is discussing site acquisition in order to clear away the hazardous structures using CDBG funding to pay for the nearly \$340,000 in demolition and abatement costs cited by contractors. Future redevelopment may include a community park. Access to the site for environmental assessments has been granted by the owner, Howard Johnson.

- **Kershaw Mill** (Lancaster County) – The Town of Kershaw is investigating the acquisition of the property (9 acres) for development. There is a known issue with asbestos on the property. DHEC shut down the demolition of the structures for lack of an asbestos survey. While the current owner of the site claims to have taken care of the asbestos in accordance with DHEC rules, the Town Manager doubts it was done properly. The community, with residents as close as 225 ft, wants to see the property cleared. Sixty-five members of the community, including many former mill workers, attended a public meeting at the Second Baptist Church in Kershaw on October 24. Residents cited leaking transformers and possible dumping of industrial-related waste products in the property's pond. There is also suspected asbestos contamination. One member, who lives 600 feet from the north side of the mill stated, "we need help getting this mess cleaned up," while another teared up over the desperation they were feeling about the situation. Residential properties made up from the former mill properties lie to the south and southwest of the site. The site is prominently located at the entrance to town, has good rail access, and desired redevelopment is for industrial or commercial reuse.
- **American Thread Mill** (York County) – Located on HWY 321, the property is a large tract of land (16 acres) in a prominent location on Main Street in the Town of Clover, surrounded by residential and commercial properties. Community representatives expressed a need to clean up the site, update legacy infrastructure, and revitalize the low-income neighborhoods of the former mill village that surround the mill (residences within 100 yds of site). Suspected contamination includes asbestos, lead based paint, PAHs, and heavy metals. Reuse of the property is expected to be a mixed use site. In the early 2010s, the community secured \$200,000 in Neighborhood Stabilization Funding (NSF) from HUD for debris removal. The property owner, Aaron Benfield has provided access (letter attached.)

Secondary priorities include the following mills: Bowling Green Spinning Mill (York County), Springsteen Mill (Chester County), Lancaster Mill (Lancaster County), Cannon Mill (York County), Coltex Mill (York County), Republic Mills 2 & 3 (Chester County), Lockhart Mill (Union County). Common mill contaminants expected at mill sites such as these are PAHs, solvents and chlorinated solvents, heavy metals, PCBs, petroleum, and asbestos and lead paint. These sites all have mill villages surrounding them.

#### **1.b. Welfare, Environmental, and Public Health Impacts**

##### *1.b.i. Welfare Impacts*

All of the small mill communities throughout the Target Area are struggling with the health and safety issues that are the unfortunate legacy of their industrial past. The descriptions of the high priority sites in the previous section detailed many of them. Blight from partially demolished and/or deteriorating mills is prevalent and affecting the neighboring communities. The vacant properties pose an ongoing safety risk due to neglected conditions of the buildings and grounds and the potential for fire, crime, and vagrancy. This year, there have been 35 reported violent crimes and 179 property crimes in an area of less than two miles from the Kershaw Mill. At the Great Falls Mill #1, the local police chief cites over 200 calls for nuisance and criminal complaints at the mill since the plant closed. Small children have been playing in the dangerous Buffalo Mill towers. At the Jonesville Mill site, standing water is a breeding ground for mosquitos, and a case of West Nile Virus has appeared in the community, stoking fears. Since 2006, three of the vacant mills in the region have burned. These fires placed additional financial pressure on strained local government budgets that are responsible for providing emergency services to fight fires, care for victims and prosecute perpetrators. Fire is a destructive threat to the mill houses often located in close proximity to the mills. These brownfield sites take a perpetual toil on the welfare of the Target Area, contributing to its decline.

##### *1.b.ii. Cumulative Environmental Issues*

The former mills are suspected or known to contain hazardous contamination such as asbestos, lead based paint, PAHs, VOCs, PCBs, and heavy metals, which are associated with their historical use. Some residents cited runoff into nearby creeks and waterways. In a geographic region roughly depicting the Target Area, the EJSCREEN mapper tool provided by the EPA shows the area includes higher levels of selected environmental indicators. The high presence of lead paint is in part due to the large number of former mill village homes. Low-income residents in these small houses are less likely to make home improvements due to a lack of financial resources – meaning old lead based paint remains in many of these old homes, exposing residents – particularly children – to the associated health risks.

#### Selected Environmental Indicators, EJSCREEN Report, 2016

Indicator	Target Area	State Average	EPA Region Average
Particulate Matter	9.43	9.39	8.90
Ozone	43.2	42.0	42.4
NATA* Air Toxics Cancer Risk	45	44	42
Lead Paint	0.27	0.15	0.16

\*National-Scale Air Toxics Assessment (NATA)

According to the Envirofacts tool, the four-county area of the Catawba COG has 271 facilities known to have produced and released air pollutants, 7 state superfund sites, 1 NPL site, 139 facilities that have reported toxic releases, 587 facilities reported to be hazardous waste generators, and 214 facilities permitted to discharge wastewater to local rivers. Data from [www.homefacts.com](http://www.homefacts.com) indicates that most zip codes in the Target Area register relatively high levels of environmental hazards as shown in the table below. All areas in the table were given a red warning indicator by HomeFacts.

#### HomeFacts Environmental Hazards Reporting, 2016

Residence	Brownfields	Registered Polluters	Superfunds	Tanks & Spills
CHESTER ZC 29706	2	17	4	37
GREAT FALLS ZC 29055	3	2	3	9
JONESVILLE ZC 29353	1	1	0	1
UNION ZC 29379	1	5	0	43
LANCASTER ZC 29720	2	9	5	88

#### 1.b.iii. Cumulative Public Health Impacts

##### Hospitalizations and Emergency Dept. Visits with a Primary Diagnosis of Asthma, Quarter 4 2015

Residence	In Patient #	In Patient Rate*	ER #	ER Rate*
<b>CHESTER COUNTY</b>	<b>28</b>	<b>86.78</b>	<b>204</b>	<b>632.22</b>
CHESTER ZC 29706	20	364.56	156	2843.60
GREAT FALLS ZC 29055	NA	NA	13	672.88
<b>YORK COUNTY</b>	<b>144</b>	<b>57.33</b>	<b>566</b>	<b>225.32</b>
CLOVER ZC 29710	13	226.32	23	400.42
<b>UNION COUNTY</b>	<b>53</b>	<b>190.81</b>	<b>160</b>	<b>576.02</b>
JONESVILLE ZC 29353	NA	NA	23	2662.04
UNION ZC 29379	36	447.48	116	1441.89
LOCKHART ZC 29364	NA	NA	5	1057.08
<b>LANCASTER COUNTY</b>	<b>41</b>	<b>47.76</b>	<b>252</b>	<b>293.56</b>
KERSHAW ZC 29067	7	341.13	44	2144.25
LANCASTER ZC 29720	27	301.47	197	2199.64

\*Rates per 100,000 population, SC Revenue & Fiscal Affairs, Health and Demographics Section; Nov 15, 2016  
Public health is threatened by the brownfields located near residential and commercial districts, including low-income communities. Local representatives cite concerns of crime and vagrancy at these properties, and three have burned within the last decade. Smoke and particulate matter from fires pose a health risk to the community and are especially dangerous for sensitive populations like children, the elderly and people with chronic illness (e.g. asthmatics). Trespassing can expose

the community to risks from the known and suspected environmental contaminants, including asbestos-containing materials and contaminated dusts, which can also impact residents with asthma. The previous table compares hospital visits for asthma-related problems in zip codes with known brownfields properties to county-level incidents. The Zip Codes with brownfields all have higher incident rates for both in patient and emergency department visits, and in the majority of cases the disparity is more than double for brownfields-impacted communities.

SCDHEC's Central Cancer Registry (November 2016) shows that many communities impacted by brownfields also have a statistically significant heightened level of cancer incidents and/or morbidity from 2009 to 2013 including Chester (ZC 29706), Great Falls (ZC 29055), Clover (ZC 29710), Jonesville (ZC 29353) and Union (ZC 29353). Additionally, the 2016 County Health Rankings for South Carolina conducted by the University of Wisconsin's Population Health Institute ([www.countyhealthrankings.org](http://www.countyhealthrankings.org)) place Union and Chester counties (where many of Target Area Census Tracts are located) as some of the lowest in the state at 36 and 34, respectively, out of 46. A *Community Needs Assessment* performed by the Piedmont Medical Center in 2013 covering Chester, Lancaster and York Counties found the area's rate of cancer deaths exceeded the state average with Chester County having the highest rate of lung cancer among all counties in the state and ranking 6<sup>th</sup> in the state for all cancers. Cancer (#1) and heart disease (#2) were the top two causes of death in 2013 in all three counties. These higher rates of cancer may be due in part to the presence of carcinogenic hazardous substances, such as heavy metals (lead, chromium, etc.) PAHs, and petroleum constituents, such as benzene.

### **1.c. Financial Need**

#### *1.c.i. Economic Conditions*

As an association funded by the member communities and without taxing authority, the Catawba COG does not have the financial resources to fund such wide scale brownfields assessment, cleanup, and redevelopment. Our agency provides project-specific assistance tied directly to grant-funded activities or contracts for our services. The majority of our annual budget, fully 88%, comes from these sources, and we do not have funding available to extend assistance for environmental assessments of brownfields. The Target Area comprises a region of particular need. Per capita income within the Target Area (\$12,226) is less than half that of the COG region as a whole (\$25,339). Cumulatively, the Catawba Region lost over 5,300 jobs from the closure of 26 textile mills between 1997 and 2009. In many cases, the smaller communities lost their primary employer when the mill closed. Financial resources in these areas are very limited, often limited to State allocations to local governments that are being continually reduces and some sales tax allocations. Mayor Ailene Ashe, who has been serving the Town of Lockhart for 20 years, works without pay. She says the tax base is so small, funding to advance the community comes solely through state and federal grants and assistance. In a statement representative of civic leaders in these small mill towns, "[I've] bloodied knees begging for help for Lockhart."

#### *1.c.ii. Economic Effects of Brownfields*

For decades, the mills in the Target Area were central to the life and welfare of residents. The plant provided stable jobs, while the company offered housing, utilities, banking and commercial services to the community. As those plants closed in the 1980s-2000s due to foreign competition and a changing economy, most of these communities failed to recover. With populations in decline, loss of a central employer and crippled with large blighted facilities, the small towns in the Target Area have been unable to mount effective economic development plans or recruit new, major employers to the area. Local communities report that these blighted properties incite crime and weaken local property values. Indeed, the median home value in the Target Area is only 60% of the region as a whole (2015 ACS US Census Bureau). The Eureka Mill once employed 2,000 workers with many living near the plant, but the facility closed in the late 1990s. Today, 40% of homes in adjacent residential areas are abandoned or condemned. The closure of 26 textile mills and loss of over 5,300 manufacturing jobs in the COG's area resulted in region-wide high

unemployment figures and a significant loss to the local tax base from reduced business and personal income taxes and sales tax revenues. This also led to migration of residents to other areas. From 2000 to 2010, the population in the Target Area declined 1%, while the state grew by more than 15% over the same period (US Census). The Target Area's unemployment rate is higher than the state, while home values and median income are both significantly lower. Furthermore, the presence of a major facility blighting residential communities and downtown commercial districts has hurt the efforts of economic developers to revitalize these communities. The City of Chester, for example, lost between 300-350 direct jobs, when the Eureka Mill was closed. Even today, the city notes that property values have been hurt by the facility and that there is "very little viable product available for commercial and industrial development." Local economic development officials regularly receive negative comments and concerns from prospective clients and site selection professionals, who are visiting their communities to vet them as suitable locations for new manufacturing plants. Many prospective investors are afraid to enter our more rural markets because of the negative impacts of these vacant mills.

## **2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS**

### **2.a. Project Description, Timing and Implementation**

#### *2.a.i. Project Description and Alignment with Revitalization Plans*

Despite the challenges these small communities face, residents of the Target Area remain committed to seeing their towns and cities revitalized. The Catawba COG has pulled together an alliance of county, city and citizen leaders dedicated to the redevelopment of the former mill properties. The Catawba COG is seeking \$500,000 for properties with potential hazardous substance contamination and \$100,000 for properties with potential petroleum contamination - \$600,000 in total – for our four-county region.<sup>1</sup> These funds will be used for community outreach, site characterization and redevelopment cleanup planning for selected brownfields properties. This project aligns with regional and local redevelopment planning. The Catawba COG's 2015 Comprehensive Economic Development Strategy lists as part of the region's top 8 needs: diversifying the region's manufacturing base in the former textile manufacture areas (i.e. Target Area), redeveloping abandoned former textile mills, and economically revitalizing local downtowns – all addressed by the proposed brownfields program. As another example, Chester County's 2008 *Economic Development Strategic Plan* proposed the redevelopment of vacant industrial buildings while the City of Chester's 2007 *Master Plan* featured the proposed redevelopment of the Springsteen Mill as key to city revitalization efforts. The Town of Clover's *Prioritized Community Needs* assessment completed in January 2017 identified, "Clearance of unsightly areas, including the dilapidated mill sites, such as the Coltex and American Thread Mill property," and "Undertake neighborhood studies in low to moderate income areas such as the American Thread Mill Village area," as key priorities.

The community in the Target Area has a high concentration of low-income minorities disproportionately impacted by the legacy of brownfields in our region. One in four live in poverty and one in three are minority. While only comprising 15% of our region's population, approximately 80% of our brownfields are estimated to reside in Target Area communities. To address the inherent social justice issues represented by these brownfield sites, the Catawba COG's brownfields program will reduce toxicity, illegal dumping, trespass, and blighted vacant parcels in these communities. Assessing sites is the first step to cleaning up these properties to help communities retain long-time residents and their families by building greener and healthier neighborhoods, mitigating negative environmental conditions through cleanup activities, provide access to new greenspace and recreational activities, and improving local employment opportunities at sites that can be reused by industrial or commercial enterprises. Overall, these

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<sup>1</sup> The City of Rock Hill is planning on submitting a separate community-wide brownfields assessment grant application; therefore, the City's jurisdiction is specifically excluded from our target area and this project.

activities will help make communities throughout the Target Area more attractive places to live, economically stronger, and healthier. Our communication strategy and recruitment of local community partners will ensure low-income minority residents are included throughout the program – building on our extensive CDBG meetings attended by 250+ community members in the Target Area.

#### *2.a.ii. Redevelopment Strategy*

The various mill communities in the Target Area have different issues and priorities for the redevelopment of their individual sites. Potential reuse ideas/strategies for each site are included in section 1.a.iii. However, there are consistent themes that underlay our redevelopment strategy for this project. [1] Our first priority is to address the environmental justice concerns related to the level of contamination and threat to human health and the environment represented by these former mill properties – particularly as they impact our vulnerable populations of children. We must protect the next generation of residents in these communities. [2] Our second priority is to remove blight and create greenspace. Many of these former mills have been demolished by scavengers or reduced to rubble by fire. Infrastructure reuse will be limited at these properties. Creating new greenspace enhances community wellness while creating more attractive areas that support the area's local economic development initiatives such as promoting nature-based tourism. Great Falls has a large community-wide campaign to revitalize itself with nature-based tourism, is working with state government to create a new state park, and also recently established a historic district. [3] Third, we will prioritize sites with strong grassroots support from the community. This will be gauged by the level of interest shown in community meetings, a documented history of coordinated action to address the problem (successful or not), and the completion of key redevelopment actions (i.e. contacting owners and securing site access, identifying interested developers, formalizing shared community visions for reuse and redevelopment, etc.). For example, while some progress has been made to address the environmental issues and blight at the Jonesville Mill and the Republic Mills properties, both initiatives have run aground after some initial progress because of a lack of financial resources. [4] Finally, we want to prioritize the potential for economic development through infrastructure reuse leading to new job creation. Selected properties in the Target Area with intact infrastructure present unique opportunities to stimulate the local economies. Cleaning up these sites will be important to securing the region's future. The large Eureka Mill, for example, has rail access and is located near I-77, making it a good location for industrial or warehouse operations.

In each case, the Catawba COG program via the Brownfields Task Force will balance the needs of the community with the anticipated benefits that can be realized given the limited amount of resources available for so many properties. By focusing on sites with a previous history of community involvement/progress and the potential for economic development, we hope to maximize the impact on the Target Area as a whole. In addition, these redevelopment activities will become models for other communities that have not yet made serious efforts to address their mill sites.

#### *2.a.iii. Timing and Implementation*

Mr. Robert Moody, Senior Planner with the Catawba COG, will oversee the implementation of the brownfields project. Mr. Moody successfully managed the COG's previous EPA brownfields grant as well as numerous other federal assistance programs. For this coalition project, representatives from all four counties, towns and cities are on the Catawba COG Board of Directors. These representatives will be actively involved in oversight of the project.

(a) Contractor Procurement: The Catawba COG will hire an environmental consultant to implement the environmental assessments and support outreach and planning. The COG will release a Request for Proposals (RFP) in accordance with 2 C.F.R. 200 and EPA's rule at 2 C.F.R. 1500 for this contract and select a qualified contractor in a competitive process. This

process will be initiated immediately upon notification of the award by the COG so that the contractor will be ready to initiate grant activities as soon as funding is available.

(b) Site Inventory: Based on our recent outreach to communities in the Target Area, a preliminary inventory of high-priority brownfields properties throughout the four county region was developed. At the initial project team meeting, sites will be prioritized based on the following criteria (as described in 2.a.ii): 1) level of perceived contamination and threat to human health and environment; 2) potential for positive indirect economic development outcomes through blight removal and greenspace development; 3) level of community support and a demonstrated history of community action to address the brownfield property issues; and 4) potential for economic development, infrastructure reuse, and job creation. Sites will be ranked and prioritized based on community input, then the project team will provide the recommendations to the Board of Directors. The Board will review and approve these selections to ensure each coalition partner's priorities are addressed and that at least one assessment is completed in each coalition member's jurisdiction. The inventory and prioritization will be reviewed and updated quarterly.

(c) Site Access: The owners (in some cases our Coalition partners) for almost all of the sites identified in this proposal have already been contacted and indicated interest in participating. Access to the Buffalo Mill, Eureka Mill, Jonesville Mill, and American Thread properties has already been secured (see letters). The project team will work closely with other property owners and local stakeholders to secure access to high-priority sites and will explore legal options to access sites, where an owner cannot be identified or contacted.

## **2.b. Task Descriptions and Budget Table**

### **2.b.i. Task Descriptions**

**Task 1: Oversight:** The Catawba COG will track project tasks, schedule and budget; oversee the work of the selected brownfields contractor; and report on project activities and accomplishments to stakeholders. The project manager will also attend relevant meetings, workshops and conferences sponsored by EPA and/or SCDHEC. The anticipated level of effort required will be 300 hours of the project manager's time amounting to \$21,000 in personnel and the eligible fringe benefit costs (\$70/hour X 300 hours = \$21,000) and \$3,000 for travel to attend the training meetings and conferences, total \$24,000. An additional \$9,750 in indirect expenses incurred by the project will be paid by the COG as in-kind leverage. The work accomplished by the Project Manager will include 12 Quarterly Reports, three annual Disadvantage Business Enterprise Utilization reports, three Financial Status Reports, and updates in ACRES.

**Task 2: Community Involvement:** The Catawba COG will use multiple distribution channels for communicating with the Target Area communities about the grant project, including local and regional newspapers, radio announcements, fact sheets and brochures, social media and public meetings. In addition, the project team will establish a Brownfields Task Force with county government representatives, representatives from community partners, and citizen stakeholders from mill communities in the Target Area. The goal of these efforts will be to inform the public of the grant activities and the progress being made to accomplish project objectives, educate impacted areas on the nature of brownfields redevelopment, and invite participation in establishing redevelopment priorities. Total project budget for community involvement is \$63,000. These costs include \$35,000 in personnel and fringe benefit costs (\$70/hour X 500 hours = \$35,000), \$3,000 in travel expenses and \$25,000 for contractor support. An additional \$16,250 in indirect expenses incurred by the project will be paid by the COG as in-kind leverage. Specific subtasks include (not inclusive of indirect expenses):

1. Develop Outreach Materials (\$12,000) – Develop a series of press releases, a project fact sheet, PowerPoint presentation, posters, and a brochure for project outreach. Costs include associated printing expenses and the development of handouts, purchase of flipcharts and production of maps for the community meetings. [Contractor]

2. Author Community Involvement Plan (\$5,000) – Create a document that outlines all the requirements for the outreach efforts, the selected strategies for effective communication and recruitment, and a specific plan of action for implementation. [Contractor]
3. Hold Community Meetings (\$30,000) – Hold local community meetings at critical milestones during project implementation, including project kickoff, site selection and post-assessment reporting. [\$19,000 COG + \$3,000 travel / \$8,000 Contractor]
4. Brownfields Task Force Meetings (\$7,000) – The Brownfields Task Force will meet on a quarterly basis to review progress, provide QA
5. guidance to the project team and prioritize and recommend sites for assessment. [COG]
6. Distribute Project Information (\$9,000) – Set up and manage a COG webpage that provides critical project updates and distribute press releases and project event notices to media. [COG]

**Task 3: Environmental Site Assessments:** The selected Contractor will complete Phase I and Phase II ESAs at high priority sites. Site Eligibility Forms will be completed and approved by EPA prior to beginning the ESAs, and Petroleum Determinations will be made by DHEC. Phase I ESAs will be completed in accordance with ASTM 1527-13 and the EPA's All Appropriate Inquiries (AAI) Rule (70FR66070). We anticipate completing at least 18 Phase I ESAs at an average cost of \$3,500 (final cost depending on project size and complexity). Three of these are expected to be on sites with potential petroleum contamination (\$10,500) and 15 on sites with potential hazardous substance contamination (\$52,500). Phase II ESAs will be completed in accordance with ASTM 1903-11. Quality Assurance Project Plans (QAPPs) and Health & Safety Plans (HSPs) will be submitted to both the EPA and SCDHEC for review and approval prior to the start of Phase II ESA activity. We anticipate completing at least 8 Phase II ESAs with a cost of \$25,000 to \$75,000, inclusive of QAPP and HSP preparation, depending on the size of the property, the degree of contamination and the complexity of the assessment activities. It is anticipated that two of these Phase II ESAs will be conducted on properties with petroleum contamination at a total estimated cost of \$66,500 (at an average cost of \$33,250 per assessment). The remaining 6 Phase II ESAs are estimated to cost \$258,000 (at an average cost of \$43,000 per assessment). We also anticipate five Asbestos-Containing Materials (ACM) surveys to be completed at an average cost of \$2,500 for a total of \$12,500. Total ESA budget = \$400,000.

**Task 4: Cleanup Planning:** Cleanup planning will be conducted for high-priority sites following the completion of the appropriate environmental assessment activity. The selected Contractor will prepare an Analysis of Brownfields Cleanup Alternatives (ABCA) for approximately 10 sites. Each ABCA will compare and contrast different methods of addressing the contamination found on the site. Costs, effectiveness, implementability, climate resiliency, and public input will be considered when evaluating the alternatives. ABCA development cost is estimated at \$7,500 per document (\$75,000 total project cost). Two of these sites are expected to have petroleum contamination (\$15,000 for petroleum/\$60,000 for hazardous). An additional \$38,000 is budgeted for COG staff to coordinate and implement community meetings and developer meetings to discuss cleanup options and remediation plans. This includes \$28,000 in labor for hazardous sites with \$2,000 in travel expenses, and \$7,000 for petroleum sites with \$1,000 in travel.

2.b.ii. Budget Table

	HAZARDOUS					PETROLEUM*		
Budget Categories	Task 1 Oversight	Task 2 Outreach	Task 3 ESAs	Task 4 Planning	Total	Task 3 ESAs	Task 4 Planning	Total
Personnel	\$15,000	\$25,000		\$20,000	\$60,000		\$5,000	\$5,000
Fringe Ben.	\$6,000	\$10,000		\$8,000	\$24,000		\$2,000	\$2,000
Travel	\$3,000	\$3,000		\$2,000	\$8,000		\$1,000	\$1,000
Contractual		\$25,000	\$323,000	\$60,000	\$408,000	\$77,000	\$15,000	\$92,000
<b>Total</b>	<b>\$24,000</b>	<b>\$63,000</b>	<b>\$323,000</b>	<b>\$90,000</b>	<b>\$500,000</b>	<b>\$77,000</b>	<b>\$23,000</b>	<b>\$100,000</b>

\*Note: As oversight and outreach for the project cannot be discriminated between hazardous and petroleum contaminated sites, activities associated with these tasks are assigned to the hazardous portion of the budget. Only activities specifically associated petroleum-contaminated sites will be funded from the petroleum-specific budget.

### 2.c. Ability to Leverage

The Catawba COG is contributing \$42,250 to the project to cover our indirect charges. The COG will also leverage local, state and private-sector investment to clean up assessed properties. During our prior region-wide EPA grant project, Catawba COG invested \$75,000 to conduct environmental assessments and cleanup planning for the Union Mill brownfields site. The City of Union invested \$402,500 in a Voluntary Cleanup Contract (VCC), land acquisition and engineering services. An additional \$900,000 was leveraged from state CDBG funds for debris removal and remediation activities. A further \$350,000 was borrowed from the South Carolina Brownfields Cleanup Revolving Loan Fund. The Catawba COG had similar success at the Springsteen Mill in Chester. The COG spent \$65,000 in EPA funding for environmental assessments (which was subsequently repaid by the city), then leveraged \$500,000 in CDBG funding for demolition and debris removal. The City of Chester contributed \$62,500 and Chester County provided an additional \$62,500 for demolition and engineering services. Similarly, we intend to assist local governments with applying for additional CDBG funds for Great Falls Mill #1, Buffalo Mill and other promising sites after assessment and reuse planning efforts are completed and VCCs are in place. VCCs are a prerequisite for CDBG funding in SC, and these funds can only be used for above-ground activities—primarily demolition and debris removal.

Source	Purpose/Role	Amount	Status
COG Indirect Charges (Donated)	Associated with labor expenses for COG personnel supporting the project.	\$42,250	Secured
Volunteer Labor	7 BF Task Force Members committed to 4+ hours of work/month; 7 x 4 hrs x 36 months = 1008 hrs.	1008 hours	Secured
	3 BF Task Force Members did not commit specific times 3 x 4 hrs x 36 months = 432 hrs	432 hours	Expected
CDBG	Debris removal and property development tasks	\$340,000	Potential
SC BCRLF	Property cleanup planning and activities	\$200,000	Potential
HUD NSF	Debris removal	\$200,000	Potential

## 3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

### 3.a. Engaging the Community

#### 3.a.i. Community Involvement Plan

The Catawba COG ran a successful community involvement operation during its first EPA brownfields grant project – engaging representatives from communities and organizations across the region. In preparation for this grant, we held three community meetings at the end of October 2017 in churches very near key brownfields targets [Great Falls (18 attendees); Buffalo Mill (29 attendees); Kershaw (65 attendees)]. With this new initiative, we will build on both successes and lessons learned to extend our efforts and ensure the participation of local community representatives throughout the Target Area. First, the project team will broadcast project information through local and regional media, including appropriate radio and newspaper (i.e. *Chester News & Reporter*, The Herald Media Group, *The Lancaster News*, *The Kershaw News-Era*, *Fort Mill Times*, *Union County News*) coverage. This will be expanded through informal grassroots networks. For example, Reverend Ford, pastor of a local church in a neighborhood near one of the area's brownfields properties distributed meeting information in his bulletin and contacted other churches in the community to disseminate information on the brownfields-related community meeting held in his area in preparation for this application (Letter of Support attached). These information networks are especially effective in reaching the general public in the rural communities throughout the broad geographic region of the Target Area. The high level

of attendance at our recent CDBG meetings (250+ community members), where brownfields were discussed is evidence of our ability to engage with these rural neighborhoods. Second, the Catawba COG will hold a series of local and regional community meetings to discuss project objectives, activities and outcomes. This will include sending COG and contractor representatives to speak at local community, town hall and organizational meetings throughout the Target Area with an emphasis on the mill communities. The community meetings will be held at various locations throughout the region to ensure residents can attend a meeting close to where they live. Third, the Catawba COG will form the Brownfield Task Force. This Task Force will be comprised of government officials at the county and local level from across the region, representatives from community partners, and selected citizens, as appropriate. The Task Force will provide guidance to the project team, help engage the community, and prioritize and recommend sites for assessment.

### *3.a.ii. Community Progress*

The community will be kept abreast of the project activities through announcements made through print, radio and social media – including Facebook, Twitter, and related feeds of our community and government partners. Project team members will attend local community, town hall and organizational meetings throughout the Target Area to update residents and other stakeholders on project developments and outcomes. Information will be disseminated through the Task Force members to their various organizational bodies and social networks. In addition, the Catawba COG will develop and maintain an email directory of interested stakeholders who will receive summary quarterly updates on project activities timed with the project's reporting activity to the EPA. In many of these small, close-knit communities the most effective communication pathways are through local print media and the informal networks among stakeholder groups. The above communication plans appropriately leverage gatekeepers to these informal networks to ensure information reaches the local level. At the same time, information repositories such as our partners' social media platforms and the COG's website will ensure there is a public record of major milestones and accomplishments.

### **3.b. Partnerships with Government Agencies**

#### *3.b.i. Local/State/Tribal Environmental Authority*

SCDHEC is the agency responsible for the State brownfields and voluntary cleanup programs. SCDHEC will continue to assist with site eligibility determinations; the technical review of assessments, site-specific work plans, and cleanup plans (ABCAs); and development of brownfields VCC agreements with property owners.

#### *3.b.ii. Other Relevant Governmental Partnerships*

As the funding agency, the **Environmental Protection Agency (EPA)** will have significant involvement in the project. The COG will work with EPA Region 4's Project Officer to ensure all work is completed in accordance with the terms and conditions of the grant and that the Work Plan is met in a timely manner. **The Midlands Public Health Region** and the **Upstate Public Health Region** will provide core statistics and other relevant data as needed and support the efforts of the Brownfields Task Force in implementing the grant program (letters attached).

The Catawba COG has strong relationships with the local governments at the county and local level throughout the region. Representatives in all four counties are on the Catawba COG Board of Directors and will be actively involved in the oversight of the project by participation on the Brownfields Task Force. The Board will review and approve the final selection of sites for assessment activities. The following governments who have offered their facilities for meeting space and agreed to share project information via their websites, social media pages, and community bulletin boards: Chester County (Shane Stuart, Supervisor); Union County (Frank Hart, Supervisor); Lancaster County (Steve Willis, Administrator); York County (David Harmon, Assistant County Manager); City of Chester (George Caldwell, Mayor); Town of Kershaw (Mark

Dorman, Mayor); Town of Jonesville (Ernest Moore Jr., Mayor); Town of Great Falls (Lee Montgomery, Mayor) and, Town of Clover (Donnie Grice, Mayor) as well as many churches in the area.

In addition, the South Carolina Department of Commerce (SC DOC) will continue its support of the Catawba COG's brownfields project. We will leverage SC DOC incentives and funding to market former brownfields sites to prospective developers to bring jobs to the region. SC DOC manages the HUD Community Development Block Grants (CDBG) program for the state.

### **3.c. Partnerships with Community Organizations**

#### **3.c.i. Community Organization Description & Role**

- Katawba Valley Land Trust – This nonprofit owns the historic Company Store – built in 1910 and located adjacent to the Great Falls Mill #1 in downtown Great Falls and a partner in the creation of the new state park nearby. The organization seeks to expand the area's tourism industry and create jobs by leveraging and preserving its cultural and natural resources. A member will serve on the Brownfields Task Force.
- Great Falls Hometown Association – The Great Falls Hometown Association is a local nonprofit organization supporting the community of Great Falls. The organization's facility is located near the Republic Mill #1 site. Members include local residents and community leaders. The association has offered the project the use of the War Memorial Building in Great Falls as a space for community meetings.
- Ember Church – Concerned about the Eureka Mill property being a haven for criminal activity, a danger to the community, and a blight, this church is available for community meetings and will disseminate project information via its social media pages. The pastor will serve on the Brownfields Task Force.
- Clover Wesleyan Church – Located directly across the street from the American Thread Mill, this church recognizes the need for redeveloping this hazardous property. The church will offer its facilities as a meeting site, disseminate project information, and its pastor will serve on the Brownfields Task Force.
- Kershaw Second Baptist Church – Located across the street from the Kershaw Mill site, this church supports redevelopment and notes many of the problems they have had being located next to this dilapidated property. The church has offered its facilities as a meeting location and they will disseminate project information to their members.
- Buffalo Baptist Church – Calling Buffalo Mill an "immense burden" on their community, the church has offered its facilities as a meeting location and disseminating project information.
- Greater Clover Chamber of Commerce – This organization is concerned about the American Thread mill located on Main Street in Clover. The organization will disseminate project information through its website and Facebook page (1,425 followers).

Citizen members of the Brownfields Task Force will include Michael Williams, J. Keith Wright, David Sinclair, and Roger Dunn. Support letters were also sent from Great Falls by Brenda Fort and Larry Flin as well as GRASP, a nonprofit concerned about Great Falls #1.

**3.c.ii. Letters of Commitment** - Letters from each of the organizations are attached.

### **3.d. Partnerships with Workforce Development Programs**

There are no EPA Brownfields Job Training Grant Programs currently in the area. However, the COG will connect consultants, remediation contractors, and potential developers with SC Works Catawba, the local Workforce Development Board, facilitate local hiring.

## **4. PROJECT BENEFITS**

### **4.a. Welfare, Environmental, and Public Health Benefits**

The primary goal of this project is to revitalize the communities of the former mill towns in the Target Area by removing significant blight; creating new greenspaces and recreation-based tourism opportunities; and enticing new industry to relocate to the area to create jobs. These

efforts can help reverse the loss of Target Area population and create new economic drivers. In addition, demolishing the buildings and removing debris will remove a potential source of harm from illegal dumping, fire and trespass to improve public safety. Many of these properties have been vacant for more than a decade and several have been burned to rubble in fires. The Phase I and Phase II ESAs and asbestos surveys at these properties will clarify environmental concerns. Due to the historical use as textile manufacturing plants, these mills are likely to contain a variety of hazardous substances that may be contaminating the soil, groundwater and nearby waterways in the communities. Assessment is the first step to cleaning up these properties which will remove the potential contamination impacting nearby lower-income residential areas and sensitive populations while reducing the number of pollution sources in the region. Cleaning up the sites will also protect sensitive populations such as asthmatics, the elderly and children who may be impacted by these properties. These efforts may also help to reduce the rates of cancer by reducing the sources of and exposures to cancer-causing substances.

#### **4.b. Economic and Community Benefits**

Removing blight and potentially returning sites to productive industrial use will create jobs and strengthen the economic potential of these former mill communities. In most cases, these small towns and cities have suffered many years of population decline and economic hardship as a result of the closure of these facilities which once employed thousands of residents throughout the region. Removing blight, creating new greenspaces and enticing new industry into the area can revitalize these struggling communities. Increased employment will also strengthen the region's tax base, thus providing more funds to improve community services. Altogether, these efforts will help stem the tide of migration. These efforts will also preserve the authenticity of the old mill villages and help retain their historic relevance. The Eureka Mill site serves as a northern gateway into Chester from the nearby JA Cochran Bypass—Chester's primary commercial corridor. This site has viable development opportunities particularly along the Saluda Road frontage for neighborhood-based retail or logistics facility due to the excellent railroad access from both CSX and Norfolk Southern. Great Falls intends to revitalize its community through nature-based tourism tied to the redevelopment of the Great Falls Mill #1.

### **5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

#### **5.a. Audit Findings**

Catawba COG is audited annually. The last audit was performed by McGregor & Company, LLP on June 30, 2016. The COG did NOT receive any adverse audit findings. The audit of the COG's 2017 fiscal year is currently in process and expected to be complete by December 31, 2017.

#### **5.b Programmatic Capability**

During its 40-year history, the Catawba COG has managed a wide range of federal and state grant programs, including over \$160 million in funding from organizations such as the EPA, US Department of Energy, US Department of Agriculture, HUD, SC DOC, SC Department of Transportation, and the Soil & Water Conservation Fund. Our 20+ member staff provide project management and financial oversight and our team has over 15 years of specific brownfields-related experience. The COG uses AccuFund accounting software to track expenses across project/grant programs. **Mr. Robert Moody**, Senior Planner, will oversee the brownfields project implementation. He successfully managed the previous EPA brownfields grant and numerous other federal assistance programs, including the rural transportation planning program with a \$5M annual budget. He has over 20 years of experience in local government planning, public engagement and community development with considerable work in brownfields redevelopment. Mr. Moody provides technical support to the BCRLF that the COG manages on behalf of SCDHEC. **Jason Vance**, a Regional Economic Development Planner, will serve as a backup project manager. Mr. Vance has 14 years of experience as a project manager meeting federal

requirements from CDBG and EDA grant programs. The Catawba COG will also hire an environmental consultant to implement the environmental assessments and support outreach and planning. The Catawba COG will release an RFP in accordance with 2 CFR 200 and 1500 for this contract and select a qualified contractor in a competitive process. The Catawba COG has the systems in place to hire or procure additional resources, if needed.

### **5.c. Measuring Environmental Results: Anticipated Outputs/Outcomes**

The project team will meet monthly by conference call to review project activities, accomplishments, schedule, and budget to ensure project goals are being met and take corrective actions, if necessary. The project team will track several performance measures to gauge success in the achieving the anticipated project outputs and outcomes. These include: number of participants in project community and task force meetings, size of stakeholder email directory, number of presentations delivered to local community groups and organizations, number of Phase I and Phase II ESAs completed, number of other assessments completed, number of ABCAs completed, acres ready for reuse, amount of leveraged funding, number of communities directly assisted by grant activities, number of communities not directly assisted by grant activities that demonstrate new or renewed interest in brownfields redevelopment. Metrics will be included in the quarterly reports and property specific information will be entered into ACRES.

### **5.d. Past Performance and Accomplishments**

#### *5.d.i. Prior EPA Brownfields Assistance Grants*

The Catawba COG has received two prior EPA Brownfields Assistance Grants: 1) a \$200,000 Brownfields Pilot Assessment grant in 2002 for a regional brownfields program covering our four-county region (completed November 2005); and 2) a \$200,000 Brownfields Assessment grant in 2006 for the Old Town area of the City of Rock Hill (completed December 2009). Due to the high number of former mill properties that remain in the Target Area and the financial constraints of the impacted communities, additional funding is needed to further the address the brownfields properties in the region. In addition, the communities in the Target Area have not had access to EPA brownfields assistance through the COG in over a decade, as the second project was focused exclusively in a targeted region in the City of Rock Hill (not part of this application).

#### *5.d.i.1. Accomplishments*

- Developed a brownfields inventory that included 16 textile-related mill sites.
  - Conducted 16 Phase I and 5 Phase II site assessments.
  - The City of Rock Hill secured \$5.9 million in brownfields cleanup funding from SC BCRLF.
  - The City of Union completed brownfields cleanup activities for a mill property under a SC DHEC VCP disbursement with technical assistance from the COG and funded by a \$500,000 CDBG award and a \$370,000 SC BCRLF disbursement, resulting in 40 apartment units and total private investment of over \$5 million.
  - Worked with a Chester community group to convert a former textile mill into a park.
  - The Gayle Mill site was turned into a community park with funding from Chester County Parks, Recreation and Tourism, Springs Industries, and Springs Close Foundation.
  - First project named 2003 "Project of the Year" by the SC Association of Regional Councils.
- The outputs and outcomes for both projects were accurately reflected in the reports submitted to EPA. ACRES did not exist yet.

#### *5.d.i.2. Compliance with Grant Requirements*

Both projects were compliant with all work plan and schedule requirements as well as all terms and conditions. The expected results were achieved and both projects expended 98% of the funding. Small balances remained at the end in order to ensure the projects did not run over budget. In addition, the COG complied with all reporting requirements, including the submission of quarterly reports, financial status reports, grant deliverables, and the property profile forms.

## Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☒ Preapplication  
☐ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

11/16/2017

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:** Catawba Regional Council of Governments

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

57-0534143

**\* c. Organizational DUNS:**

1057957020000

**d. Address:**

**\* Street1:**

215 Hampton St.

**Street2:**

Suite 200

**\* City:**

Rock Hill

**County/Parish:**

**\* State:**

SC: South Carolina

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

297300000

**e. Organizational Unit:**

**Department Name:**

**Division Name:**

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

Mr.

**\* First Name:**

Robert

**Middle Name:**

**\* Last Name:**

Moody

**Suffix:**

**Title:** Senior Planner

**Organizational Affiliation:**

**\* Telephone Number:** 803-327-9041

**Fax Number:**

**\* Email:** rmoody@catawbacog.org

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

E: Regional Organization

### Type of Applicant 2: Select Applicant Type:

### Type of Applicant 3: Select Applicant Type:

### \* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

### CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-17-07

### \* Title:

FY18 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

### 13. Competition Identification Number:

### Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Catawba Regional COG Coalition Assessment Project for the counties of York, Chester, Union, and Lancaster, South Carolina

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

**Add Attachment****Delete Attachment****View Attachment****17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="600,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="600,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

**Add Attachment****Delete Attachment****View Attachment**

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: \* Signature of Authorized Representative:  \* Date Signed:



City Manager's Office  
P.O Box 1177  
Aiken, South Carolina 29802  
803-642-7654

135 Laurens Street SW  
Aiken, South Carolina 29803  
Fax: 803-642-7646  
311@cityofaikensc.gov

R04-18-A-067

November 15, 2017

Ms. Barbara Alfano  
Region 4 Brownfields Coordinator  
U.S. Environmental Protection Agency  
Atlanta Federal Center  
61 Forsyth Street, SW 10<sup>th</sup> FL, Atlanta GA 30303-8960  
Phone (404) 562-8923

Dear Ms. Alfano:

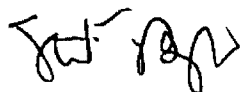
The City of Aiken is pleased to submit the attached application to the FY 2018 US EPA Brownfields Program for a Brownfield Community-Wide Assessment Grant in the amount of \$300,000 (\$200,000 for Hazardous Substances and \$100,000 for Petroleum). This grant will greatly enhance the City's efforts to remediate commercial and industrial contamination in the Downtown and Northside communities.

Through this Federal Brownfields Program, the City of Aiken hopes to build upon the success we have already achieved in the Northside district with our Eustis Park project through our State's brownfields program. Our current project has realized the assessment of pesticide-impacted soils, UST-related soil and ground water impacts, asbestos, and lead-paint at the former school district maintenance facility adjacent to one of our City Parks. We plan to redevelop this property into a community center/meeting space. Our goal for cleanup is to integrate one-site engineering controls for the majority of identified impacts. We are nearing a Certificate of Completion from the State related to the environmental issues on-site. Through the State brownfields program, we have seen the positive impact one individual brownfields project can have on a community. We envision this project as a prototype for other idle brownfields within the Downtown and Northside areas. We hope to build on the buzz brownfields have created with our community partners and elected officials. To that goal, the City of Aiken appreciates the opportunity to apply for FY18 EPA Brownfields Community-wide Assessment Grant funding.

<b>Required Information</b>	
<b>a. Applicant Identification:</b>	City of Aiken 135 Laurens Street, SW Aiken, SC 29801
<b>b. Funding Request:</b>	i. Grant type – Assessment ii. Assessment Type – Community Wide iii. Federal Funds Requested: \$300,000 iv. Contamination: Hazardous Substances \$200,000 and Petroleum \$100,000
<b>c. Location</b>	The Downtown and Northside communities within the City of Aiken, Aiken County, South Carolina
<b>d. Property Information</b>	N/A – not site specific
<b>e. Contacts:</b>	i. Project Director: Joy Gillespie Capital Projects Sales Tax Manager 135 Laurens Street, SW Aiken, SC 29801 (803) 643-2123 <a href="mailto:ygillespie@cityofaikensc.gov">ygillespie@cityofaikensc.gov</a> ii. Highest Elected Official The Honorable Rick Osbon, Mayor 135 Laurens Street, SW Aiken, SC 29801 (803) 645-2833 <a href="mailto:rosbon@cityofaikensc.gov">rosbon@cityofaikensc.gov</a>
<b>f. Population:</b>	i. General Population of jurisdiction: 29,524 (April 2010 Census) ii. Non municipal Populations provide population of target areas or N/A if municipal applicant: N/A iii. Affirmation if applicable of "Persistent Poverty" >20% poverty for 30 years: N/A
<b>g. Regional Priorities Form/ Other Factors Checklist:</b>	Attach to Cover Letter
<b>h. Letter from State Environmental Authority:</b>	Attached to Cover Letter

The City of Aiken appreciates the opportunity to apply for FY 18 EPA Brownfields Community-wide Assessment Grant funding. If you have any questions, please do not hesitate to contact us.

Sincerely,



Stuart T. Bedenbaugh  
Deputy City Manager  
City of Aiken

**City of Aiken****FY18 US EPA Community Wide Assessment Grant Application**

Name of Applicant: City of Aiken

**Regional Priorities Other Factor**

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

**Regional Priority Title(s):**

*Assistance to Communities That Have Limited In-House Capacity to Manage Brownfield Projects – This regional priority includes proposed projects that provide support to communities that have limited capacity or administrative infrastructure to effectively manage brownfields programs. Proposals that include partnerships among governmental entities having shared jurisdiction over the target sites (e.g. state, regional authorities, local governments) relate to this priority.*

Page Number(s): 6

**Assessment Other Factors Checklist**

Please identify (with an x) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

<b>Other Factor</b>	<b>Page #</b>
<i>None of the Other Factors are applicable.</i>	N/A
Community population is 10,000 or less.	2
The jurisdiction is located within, or includes, a county experiencing “persistent poverty” where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	N/A
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
Target brownfield sites are impacted by mine-scarred land.	N/A
Project is primarily focusing on Phase II assessments.	8
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	9,15
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	N/A



November 10, 2017

Barbara Alfano  
Region 4 Brownfields Coordinator  
United States Environmental Protection Agency  
Resource Conservation and Restoration Division  
61 Forsyth Street SW  
Atlanta, Georgia 30303-8960

RE: EPA Brownfields Community-wide Assessment Grant  
City of Aiken, South Carolina

Dear Ms. Alfano:

The South Carolina Department of Health and Environmental Control, the State's environmental authority, acknowledges and fully supports the City of Aiken's application for a community-wide Brownfields Assessment Grant. The grant will facilitate revitalization in the Downtown and Northside areas of Aiken, South Carolina further progressing the momentum created by the Brownfields redevelopment of the Aiken County School District Maintenance site.

The Department appreciates your consideration of the application and hopes for a favorable outcome. Your positive response will assist the City in its efforts to revitalize properties in the community. If you have any questions or need additional information, please contact Robert Hodges of my staff at (803) 898-0919.

Sincerely,

A handwritten signature in cursive script that reads 'Daphne Neel'.

Daphne Neel, Chief  
Bureau of Land and Waste Management

cc: Travis Fuss, Midlands EA Aiken  
Robert Hodges, Manager, Brownfields Program

**City of Aiken, South Carolina**  
**FY2018 US EPA Brownfields Assessment Grant**

**1. COMMUNITY NEED a. Target Area and Brownfields i. Community and Target Area Descriptions** Aiken, South Carolina, is the county seat for Aiken County. We are located along the western border of the state, separated from Georgia by the Savannah River, and, as of 2015, are home to around 29,500 people. We have three unofficial “districts” within our City, the Southside, Downtown, and Northside communities. The Southside is the area with the large residential developments, the golf courses, the shopping, the equestrian events, and the hotels. The Downtown area has seen some revitalization, yet the boarded storefronts are still present, the in-town residents absent. This lag may be attributed to the north-adjacent Northside district, which has seen a significant decline over the last 40 years. **The Downtown and Northside are roughly approximated by Aiken County Census Tract 214, and are our target area for this brownfields assessment grant.**

Our city was founded in 1835, around the terminus of a rail line from Charleston to the Savannah River, and was named for William Aiken, the railroad's first president. Our history is storied, notably for a Civil War conflict in the City where a detachment of Union General Sherman's troops were defeated and turned back, thereby protecting the nearby industrialized areas of Graniteville and Bath in Aiken County. After the close of the Civil War, our mild winter temperatures and our blooming equestrian culture made Aiken a favorite overwintering spot for wealthy individuals from the Northeast and Canada. An explosion of growth came when the US Government's Savannah River Site (SRS) was constructed south of the City in the 1950s.

The SRS facility was constructed in 1950 to produce fissile materials used in the fabrication of nuclear weapons in support of the nation's defense programs. Five production reactors and a number of support, fabrication, tritium extraction, and waste management facilities were constructed across the 310-square mile facility. The SRS was one of our largest employers. At its peak, SRS employed nearly 25,000 people; however, the era of nuclear weapons production began to wane in the 1990s. With the mission of the SRS beginning to sunset, the jobs at the facility and in adjacent industries tied to the site began to diminish. Today, the facility employees around 10,000 people. Many of those former employees were residents of the Northside communities. Those neighborhoods and schools were constructed in the 1950s to serve the influx of workers at SRS. When the jobs declined, the workers moved away, and those once vibrant communities, places like Crosland Park and Toole Hill within the Northside, now have low property values, blighted properties, high unemployment, elevated foreclosure rates, and high crime. For example, the Crosland Park neighborhood lacks streetlights. The neighborhood is dark at night, and that darkness provides cover for criminal activity. Children say the lack of street lights contributes to an unsafe feeling at night.

The Northside is bisected by US Highway 1, which before the interstate system was built in the mid-20<sup>th</sup> Century, was **the major East Coast north-south route in the US**. Situated on the northern outskirts, the Northside was the northern gateway for bulk materials entering and leaving the City. In the early 1900s, the area was home to two former bulk petroleum storage facilities, a former fertilizer company; a former ice manufacturing facility; and a former coal yard. These larger, more industrial-scale operations in turn provided goods and services to more specialized operations in Downtown. In the Downtown area, we have identified former drycleaners, former printing operations, and former auto repair facilities. Many of these now-idle properties have been hindered in their redevelopment or have hindered adjacent redevelopment projects, and given their proximity to residential properties, may represent a threat to public health and the environment.

**City of Aiken, South Carolina**  
**FY2018 US EPA Brownfields Assessment Grant**

The City is committed to a multi-pronged approach to remedy the myriad of issues facing the community. We are currently battling blight through a partnership with target area community-based organizations. We are developing green infrastructure to provide lighting, update sidewalks, and mitigate run-off issues. We see brownfields redevelopment as another critical path for our communities.

We have already achieved some success in the Northside district through our State's brownfields program at the Eustis Park expansion project. The project has realized the assessment of pesticide-impacted soils, UST-related soil & ground water impacts, asbestos, and lead-paint at a former maintenance facility adjacent to the park. The facility was originally built as a school for the SRS workers' children in the 1950s; however, prolific asbestos and aging structures relegated the campus to a staging area for the school system's maintenance crews. The asbestos has been abated and the structures have been demolished. We will break ground soon on a new community center/meeting space. The project completion is highly anticipated by the community. Through the State brownfields program, we have seen the positive impact one individual brownfields project has had on our community. We envision this project as the prototype for other idle brownfields within the Northside and Downtown target area; we simply lack the sustainable resources to kick off this effort community-wide.

**1.a.ii. Demographic Information and Indicators of Need** The US Census Data Explorer indicates the Northside and Downtown areas (Aiken SC Census Tract 214) have a high minority population, a high percentage of families living below the federal poverty level with median household incomes significantly below state and national figures; a high percentage of individuals 65 or older; a low percentage of individuals in the labor force; and a low education attainment level. **When compared against the balance of Aiken County, the proposed focus area has a much higher minority population with nearly 3 times the poverty rate, who earn nearly half the comparable household income.** The following table gives a snapshot of our community.

Metric <sup>1</sup>	Target Area -Census Tract 214	Aiken County	Statewide	National
Population	5,713	161,710	4,777,576	316,515,021
Unemployment	Not available (see labor force participation*)	4.3%	4.0%	8.3%
Poverty Rate (Families)	38.9%	13.8%	13.5%	15.5%
Minority	80.9%	28.7%	32.4%	37.8%
Median HH Income	\$24,315	\$44,509	\$44,779	\$53,889
65 and over	21.8%	15.9%	14.2%	14.9%
*Not in Labor Force	50.9%	41.5%	38.3%	37.3%
No H.S. Diploma 25+	22.6%	14.6%	14.4%	13.3%

<sup>1</sup>Data are from the 2011-2015 American Community Survey 5 Year Estimates available on American FactFinder at [https://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml](https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml) <sup>2</sup>Data are from the 2011-2015 American Community Survey 5-Year Estimates available on American FactFinder at [https://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml](https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml). *Note, the percent minority is derived from the HISPANIC OR LATINO AND RACE population table (i.e., the sum of the Hispanic or Latino (of any race), Black of African American alone, American Indian and Alaska Native alone, Asian alone, Native Hawaiian and Other Pacific Islander alone, Some other race alone and two or more races percentages).*

**1.a.iii. Description of the Brownfields** We initially plan to assess **two former bulk oil facilities**. We plan to prioritize the assessment of these former facilities based on their proximity to the residents surrounding them. Both properties are within our target area and have been

**City of Aiken, South Carolina**  
**FY2018 US EPA Brownfields Assessment Grant**

vacant for many years, yet they are adjacent to community “hubs”. One former facility is located adjacent to the **Aiken Vocational Rehabilitation Office and Work Training Center** and residential properties within the target area. The other former facility is adjacent to residences and the **Aiken Farmer’s Market**. The Farmers Market opened in 1951. According to a historical marker on the property, it is the oldest county farmers market “in continuous service in the same location” in South Carolina. One of the City’s goals, based on public input, is to expand the Farmer’s Market; however, given the historical significance of the current site, moving the facility to a location with more space is not an option. Since the other adjacent properties are occupied residences, our only opportunity for expansion is onto the adjacent property that was formerly occupied by the bulk oil facility. The City has already received verbal access to both properties. Petroleum impacts to soil, soil vapor, and ground water, as well as potential derelict USTs are highly likely.

The **former Downtown Hospital** is what many consider to be the western gateway to Downtown and the Northside. The hulk is located near single-family residences, a senior living facility, and a women’s shelter. Built in 1917, the structure has been used most recently as office space. The imposing brick structure, typical of early 1900s institutional architecture, has been vacant since 2014. Likely impacts present at the old facility include USTs, asbestos, and lead. Disposal of wastes may also have occurred on this property given the time of operation. ATSDR indicates contaminants can include X-ray developers and fixers; infectious wastes; radiological wastes; and biological wastes. The grounds are located one block away from the current Eustis project, separated by an apartment complex for the elderly. Aiken County currently owns the structure and grounds; we will partner with them in marketing the property for redevelopment.

The City has identified three adjoining properties for redevelopment in Downtown. These properties, collectively known as the “**Newberry Street Parcels**”, comprise half of a Downtown city block. The current owner has had difficulty selling the property due to its environmental legacy. Various drycleaners have been present at different locations on the site for over 90 years. The most recent drycleaner occupant formerly utilized a UST for solvent storage. The site was also occupied by a newspaper printing operation for over 60 years. The site is adjoined to the north by a church and office buildings; to the east by a restaurant (formerly Gulf Service Station); to the south by Newberry Hall; and to the west by the Hotel Aiken. Residential housing starts three blocks east and west. Likely impacts at the site include asbestos/lead paint in the buildings; petroleum compounds, chlorinated solvents, and PAHs in soil, soil vapor, and/or ground water. The City would like to acquire the property for redevelopment as retail space and a parking garage. Acquisition of the property would likely occur subsequent to a state brownfields agreement given our positive experience with the program at the Eustis project.

Other facilities we have identified within the target area include several former auto repair facilities; a former fertilizer company; a former ice manufacturing facility; and a former coal yard. We have not initiated site access at these other facilities. We plan an inventory of potential sites as one of our initial tasks.

**1.b. Welfare, Environmental, and Public Health Impacts i. Welfare Impacts** In early 2016, the City held a Strategic Planning Retreat to develop a strategy for Aiken’s future, focusing on the results of December 2015 public interviews and a January 2016 public meeting. The primary community concerns involved access to Downtown and community parks; of particular concern was connectivity from Northside to the rest of the City. The Northside is a food desert (USDA ERS / Food Access Research Atlas). with a relatively high number of households (17.2%) without vehicles that are more than one-half mile from a supermarket. The Public Transit system

**City of Aiken, South Carolina**  
**FY2018 US EPA Brownfields Assessment Grant**

only operates its three routes on weekdays, leaving those without vehicle access with limited options to buy food or commute to work on the weekends. Potential solutions offered during community visioning sessions include better access to green infrastructure, connectivity to parks, and **better access to healthy food options**, such as the expansion of the Farmer's Market (see Section 1.a.iii.).

We are actively combating blight in the target area, which in many cases can be directly related to the proximity to brownfields sites. As of 2017, the City has purchased and demolished 23 blighted structures in the Northside through the Neighborhood Initiative Program grant (NIP, see Section 2c). This effort is limited in scope to those properties with little perceived environmental risk. As such, the NIP has been unable to address properties like the former petroleum storage facilities or the hospital. To further combat blight at brownfields, we recognize additional due diligence efforts are necessary prior to purchase.

Crime in the Downtown and Northside areas is disproportionately high. According to the City of Aiken Public Safety Crime Data ([www.cityofaikensc.gov/crimeanalyzer/statistics](http://www.cityofaikensc.gov/crimeanalyzer/statistics)), within an approximate 2-mile radius north of the City center, 3110 crimes were reported between Sept. 2015 and Sept. 2016. In contrast, during the same period, the southern half of the 2 mile radius from the City center reported around half as many crimes. The rise of unemployment/poverty can be directly associated with the lack of investment in the community, which in turn results in higher crime. For example, the number of murders in the area between 2008 and 2012 spiked from one to seven. Among those murdered were two public safety officers. The surge of murders in a City of less than 30,000 prompted the City to implement the Aiken Safe Communities Initiative to reduce high levels of crime and recidivism; however, there is still the **perception** of significant crime. Local media have fueled the perception by continuing to refer to places like to Crosland Park, one of the neighborhoods within the target area, with the moniker: "Combat Park."

**1.b.ii. Cumulative Environmental Issues** The City is home more than 200 regulated UST facilities (SCDHEC UST Registry) and four SCDHEC Drycleaner Restoration Trust Fund facilities (note: for these databases, resolution limited to the target area was not available). One State Superfund Site, is located approximately one mile northeast of residents within the target area along the County's industrial corridor (U.S. Highway 1) north of the City center. A former landfill is located in the target area adjacent to residential properties and the City's dog park. USEPA's EJScreen tool (2017 version) estimates the target area is in the 82<sup>nd</sup> percentile or higher for all EJ indexes except water dischargers. The target area is bisected by the major north/south traffic arteries (U.S. Highway 1 and SC Highway 19) between the City center and the industrial corridor/airport/Interstate 20 north of the City. The Downtown/Northside target area is also bisected by a 6.45-mile freight rail. The Sand River is the cumulative receiving water for much of the runoff in the target area. The Sand River flows west through Hitchcock Woods, a park/nature preserve on the west of the target area, and ultimately into the downstream receiving waters of Horse Creek and Langley Pond. Numerous studies have indicated severe erosion within the watershed that has been increasing for the past 60 years as the development grew in the watershed. Much of the development was prior to "modern" stormwater management practices such as stormwater retention basins, rain gardens, etc.; when poor stormwater management is compounded by idle properties, runoff and subsequently erosion increase. Relevant studies include: *Hydrological Evaluation of the Sand River Headwaters Stormwater Infrastructure - Clemson University 2015, April* and *Sand River Ecological Restoration Preferred Alternative - Clemson University Center for Watershed Excellence February 2009.*

**City of Aiken, South Carolina**  
**FY2018 US EPA Brownfields Assessment Grant**

The downstream receiving waters currently have fish consumption advisories related to chemical impairment in sediments by PCBs, mercury, nickel and chromium. Our brownfields may have contributed to the issue, exacerbated by increased storm water erosion. The reports cite a need for development of green infrastructure as a remedy.

**1.b.iii. Cumulative Public Health Impacts** Sensitive populations in the form of minority groups, low-income populations, and adults over 65 years of age are disproportionately represented within the target area (see Section 1.a.ii.). Many of the residents in the target area live adjacent to our proposed brownfields projects. According to the 2016 SCDHEC Aiken County Cancer Profile, the most common cancers in Aiken County, in order of occurrence, are **breast/prostate** (#1 for women/men respectively), **lung, colorectal, and pancreatic cancer** (see **bold** in Table below). The following table represents our cumulative health impacts in the area:

<i><b>Historic Use</b></i>	<i><b>Associated Contaminants</b></i>	<i><b>Resulting Human Health Impacts</b></i>
<i>Drycleaners</i>	<i>VOCs</i>	<i>Asbestos – increased rates of <b>lung cancer</b>, other lung diseases, cancer of the throat, larynx, stomach, colon and rectum.</i>
<i>Printing Operations</i>	<i>VOCs, PAHs</i>	<i>Arsenic – cancer in skin, <b>lungs</b>, bladder and kidney. Can cause damage to chromosomes.</i>
<i>Manufacturing</i>	<i>Asbestos, mercury, cyanides, PCBs, acid, metals, pesticides, VOCs, SVOCs</i>	<i>Mercury – toxic effects on the nervous, <b>digestive</b> and immune systems and <b>lungs</b>, kidneys, skin and eyes.</i>
<i>Former Service Stations</i>	<i>Petroleum Products, VOCs, PAHs, metals</i>	<i>PCBs – highly toxic and can cause <b>reproductive</b> and developmental problems, damage the immune system, interfere with hormones and also cause cancer.</i>
<i>Bulk Oil Storage</i>	<i>Petroleum Products, VOCs, PAHs, metals</i>	<i>Lead – attacks the nervous system leading to reduced intelligence and behavioral and learning difficulties, children and developing fetus are at highest risk; death.</i>
<i>Blighted/Abandoned/Idle Properties (Former Downtown Hospital)</i>	<i>Asbestos, Lead-Based Paint</i>	<i>VOCs/SVOCs/PAHs – irritation to eyes, nose and throat; headaches, nausea and problems to the nervous system; cancer.</i>
<i>Former School Maintenance (Eustis Park State Brownfields Project)</i>	<i>Asbestos, Lead-Based Paint, pesticides, PAHs, VOCs</i>	<i>Petroleum products – negative effects to nervous system, blood and kidneys; cancer.</i>
<i>Railroad</i>	<i>Arsenic, creosote, PAHs</i>	<i>Pesticides – cancer (leukemia, non-Hodgkin's lymphoma, brain), problems with the nervous and reproductive system, liver, asthma.</i>
		<i>Sediments – PCBs, DDT, mercury – suspected carcinogens, toxic effects on the nervous, <b>digestive</b> and immune systems and <b>lungs</b>, kidneys, skin, hormones.</i>

**1.c. Financial Need i. Economic Conditions** The largest employer in the region has been, since the 1950s, the Savannah River Site (SRS). In the 1990s, the facility employed nearly 25,000 people; employment today is around 10,000 people. Those 15,000 jobs lost equal to over 50% of our current total population in terms of raw numbers. This number does not account for other losses in jobs from adjacent services to the facility (not quantified). This slow decline from the 1990s peak was compounded by the “Great Recession”. More than half of the individuals in the target area are not in the labor force. As such, income inequality is prevalent in the target area, with a median income of around half of the County’s median income. Poverty has risen as a result, with a rate nearly 3 times the rate of the County as a whole. Blight has risen (see 1.c.ii below), lowering property values and property tax revenue and placing a burden on our community. These conditions have reduced the ability of our community to support critical municipal services. The City does not budget for properties that we do not plan to purchase; as such, any brownfields assessment funding that we provide to non-governmental

**City of Aiken, South Carolina**  
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prospective purchasers must come from economic development contingency funds. **Given the Regional Economic Benchmarking Report for Aiken County- 2016 Update conclusion that total government expenses for the City are growing faster than total government revenue**, we cannot continue to sustain brownfields assessment and redevelopment projects on our own and leaves us with limited in-house capacity to manage brownfield projects.

**1.c.ii. Economic Effects of Brownfields** As an example, Aiken County, who employed 872 individuals as of 2012, once occupied the former Downtown Hospital site. Since the County left the site in 2014, this structure has been vacant and providing no economic benefit for the community. Home ownership has followed the same trend as the Hospital property; indeed the dire employment situation within the target area has resulted in a sharp rise in blight. The target area lies within the 29801 zip code for Aiken. Per [usa.com](http://usa.com), census information, there are 6,467 owner-occupied housing units within this zip code. Per [realtytrac.com](http://realtytrac.com) (August 2017), the 29801 zip code falls at the high end of the spectrum with 1 in every 919 units in some type of foreclosure action. In comparison, the Southside zip code, 29803, has a foreclosure rate of 1 in every 1,230 units. In August 2017, the number of properties that received a foreclosure filing in 29801 was 62% higher than the same time last year. For properties that are sold, the median sales price for 2017 was 35% lower than 2016. In addition, according to the Aiken County's Draft Comprehensive Plan 2014-2024, around 25% of homes are rented. Typically rented homes do not contribute to increases in property value versus owner-occupied units. Renters are not typically committed to long-term neighborhood improvement. The Comprehensive Plan also indicates that manufactured housing occupancy has increased at rate of 920% from 1970 to 2012. Mobile homes pose a unique problem in that they depreciate like cars, to the point of generating disproportionately lower tax revenues than is required to off-set the cost of public services received, i.e. fire and police protection, recreation, etc. These factors all result in sharp declines in tax revenue available for reinvestment in brownfields within the community. **Given that total government expenses for the City are growing faster than total government revenue, this condition is not sustainable.**

**2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS** **a. Project Description, Redevelopment Strategy, and Timing and Implementation** **i. Project Description and Alignment with Revitalization Plans** The City of Aiken is requesting a US EPA Brownfields Assessment Grant for hazardous substances and petroleum products of \$300,000 for a community-wide brownfields assessment program. We are seeking to address idle brownfields within the Northside and Downtown, areas of our City demonstrated to have the most welfare, environmental, and public health impacts. This grant will fund up to 14 ASTM-AAI compliant Phase I ESAs (Environmental Site Assessments), 1 Generic Quality Assurance Project Plan (QAPP), 6 Site-Specific QAPPs, 6 Phase II ESAs, and 4 Analysis for Brownfields Cleanup Alternatives (ABCAs) or reuse plans. Details of these tasks are provided below in Section 2.b.i. This project aligns directly with the needs identified in the **Aiken County Comprehensive Plan 2014-2024**, the ongoing green infrastructure development plans, the **Aiken Safe Communities Initiative**, and the **Neighborhood Initiative Program** (see Section 2c).

In order to understand our communities' ideas for what they would like to see their City become, the City of Aiken Council held a **Strategic Planning Retreat** in February 2016. This meeting was our renewed effort to craft a vision that responds to the voice and ideas of Aiken's residents and inspires future development and policies. The question we posed for public response was: **"What will make Aiken the best it can be?"** Public responses germane to our brownfields project are these key **Components**: 1) the Northside, Downtown, and Southside are

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basically three different towns that the community would like to connect; 2) to that end, stakeholders asked for connectivity to Downtown through improvement of parkways and walkability through greenways/parks; 3) another priority was to enhance amenities for Downtown. Specifically, an expansion of the Farmer's Market; and 4) the community would like us to provide incentives for local businesses to develop in the Northside. We believe this community vision aligns perfectly with our brownfields vision to target those properties as discussed in Sections 4.a and 4.b and to address directly Components 2, 3, and 4 above.

We have the specific outcomes in mind to address the Components above. By expanding the Farmer's Market onto the former bulk oil facility site, we hope to directly combat the food desert issues and meet Component 3. We plan to continue development of green infrastructure with projects like our Eustis Park expansion at the other former bulk oil facility to help address Component 2. The Newberry Street Parcels re-development is poised to add jobs and integrate protective measures for likely existing contamination sourced from former drycleaners and newspaper printing operations to address Component 3. Component 4 can be achieved through the coupling the state brownfields approach implemented at Eustis Park to offer state liability protections and tax incentives that specifically promote brownfields redevelopment. The City stands ready to initiate state brownfields agreements on each project, and those brownfields incentives inure to all subsequent purchasers.

**2.a.ii. Redevelopment Strategy** In response to the watershed impairment (see Section 1.b.ii.), the Sand River Headwaters Green Infrastructure Project was initiated to reconnect Downtown stormwater flow into a subset of parkways. A dozen parkways in Downtown are being reconfigured with bioretention areas to capture and treat stormwater while adjacent streets and parking lots are being reconstructed with pervious concrete, asphalt, and pavers which will absorb larger amounts of rainfall. The concepts of this initiative (pervious pavements, bioretention, etc.) are being implemented at our Eustis Park project; our goal is to implement these same green infrastructure concepts at both former bulk oil facilities and the hospital brownfields projects. The Farmer's Market expansion (2.a.ii.) in particular has needs for improved access/parking, and pervious surfaces will be incorporated into the design. Priority will be given to assessment at the former bulk oil facilities and the hospital because these projects are adjacent to residents and verbal site access has been granted.

We plan to maximize developed space at the Newberry Street Parcels in order to limit contact with impacted soils. The City is in dire need of expanded Downtown parking options, with only on-street parking available for proximal businesses. Multi-level parking will provide an exposure barrier to direct contact with existing contamination as well as provide ground-level open space to short-circuit any potential vapor intrusion. The added commercial space will add jobs and tax revenue and will certainly proceed under the state brownfields program.

**2.a.iii Timing and Implementation** The City has an established formal procurement process. Following the award the city will prepare a competitive bid process RFQ. Contract procurement will be completed in full compliance with state and federal and municipal guidelines including 2 C.F.R. 200 and EPA's rule at 2 C.F.R. 1500. The sealed bid, review and selection process will be processed and administered by appropriately identified department staff. Contractor procurement will be completed no later than three months after notification of grant award, and will run concurrent with work planning.

Potential sites have already been identified (See Section 1.a.iii.; all four sites have access already in place); however, we plan to further develop this list through a site inventory which may well shift priority if new or sensitive receptors are identified. Our process will consider

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proximity to residents, likelihood of contamination and health/environmental effects, community needs, potential for redevelopment (jobs), likelihood of obtaining site access among other criteria. It is our goal to create a transparent process which includes input from the public to include local citizens and potential investors throughout all phases including site selection and cleanup/reuse planning.

Within 30-days of site identification/prioritization, property owners will be engaged for site access (note that we already verbal access to several of our proposed sites). Access to sites will be gained through land owner and City staff/contractor meetings, including educating the owners on the benefits of this assessment project. Information on the State brownfields program will be emphasized, especially in regard to prospective developers. The City as grantee will take the lead on securing site access through a formal access agreement.

**2.b. Task Descriptions and Budget Table 2.b.i. Task Descriptions** We anticipate the following tasks under this brownfields project. Costs were developed for each task and subtask based on our experience and expenditures with due diligence work the City has already conducted. City staff time will be devoted to Outreach, Inventory and Program support but are considered leveraged costs and are not budgeted.

**Task 1: Community Outreach: \$12,600** (\$7,350 Haz. /\$5,250 Pet.). Active engagement and participation of strategic partners and our community is integral to a successful program. Contractor costs are budgeted at \$4,600 for development of a Community Involvement Plan (CIP), and \$5,000 for educational workshops, interactive community meetings, multimedia communication, web site development and maintenance. City costs are budgeted for \$3,000 in supply costs for print media (brochures, flyers, fact sheets and maps).

**Task 2: Inventory: \$12,000** (\$9,000 Haz. /\$3,000 Pet.). Contractor costs are budgeted for research of potential hazardous substance and petroleum sites by evaluating readily available information from the assessor's office and using available Geographic Information Software (GIS) to identify abandoned and vacant properties. This research helps separate viable brownfields sites from regulated and ineligible properties. Prioritization criteria will be established using community input for ranking of the inventory sites identified. GIS mapping will track potential sites. Funds will gather regulatory information on sites, weigh rating factors from community input, prepare GIS based maps for evaluation and summarize information for planning and review (\$12,000 contractual).

**Task 3: Phase I and II Assessments: \$226,400** (\$149,900 Haz. /\$76,500 Pet.). We will conduct environmental site assessment activities in accordance with 40 CFR Part 312 All Appropriate Inquiry, ASTM E1527-13 for Phase I ESAs and in general accordance with the SCDHEC VCP's typical approach to Phase II assessments. Contractor costs budgeted for 14 Phase I assessments (9 hazardous substances, 5 petroleum) averaging \$3,600+/- each (total of \$50,400 budgeted); 1 Generic Quality Assurance Project Plan (QAPP) at \$5,000; 6 Site-Specific QAPPs/Health and Safety Plans at \$3,500 each for a total of \$21,000; and 6 Phase II assessments (4 hazardous substance, 2 petroleum) at \$25,000 each for a total of \$150,000.

**Task 4: Cleanup Planning: \$27,000** (20,250 Haz. / \$6,750 Pet.). Cleanup planning will include evaluating cleanup alternatives, calculating cleanup costs and determining site appropriate remediation and/or reuse plans to reduce health/environmental risks for selected sites. Working with the community and the State, the City will establish a unified vision and set goals for reuse planning. Charrettes or visioning sessions may be held for the redevelopment of key properties. Contractor costs budgeted to develop and present four (4) Analyses for Brownfields Cleanup Alternatives (ABCAs) or Reuse Plans at \$6,750 each.

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**Task 5: Program Support: \$22,000** (14,500 Haz. /\$7,500 Pet.). Contractor costs budgeted for program support includes program management, assistance in completing EPA quarterly reports, MBE/WBE forms, EPA ACRES database, annual projections, closeout and other support necessary to maintain compliance with the EPA cooperative agreement. Travel funds for attendance and registration of City staff at the national conference and Region 4 grantees workshop or other brownfields-related training workshops (\$5,000).

**2.b.ii. Budget Table**

Budget Categories		Project Tasks					
(Programmatic Costs Only)		Outreach	Inventory & Prioritization	Phase I/II Assessments	Cleanup Planning	Program Support	Total
Personnel	HS	0	0	0	0	0	0
	PET	0	0	0	0	0	0
Travel	HS		0	0	0	3,000	3,000
	PET		0	0	0	2,000	2,000
Supplies	HS	1,500	0	0	0	0	1,500
	PET	1,500	0	0	0	0	1,500
Contractual	HS	5,350	9,000	149,900	20,250	11,500	195,000
	PET	4,250	3,000	76,500	6,750	5,500	97,000
Total - HS		7,350	9,000	149,900	20,250	14,500	200,000
Total PET		5,250	3,000	76,500	6,750	7,500	100,000
<b>Total</b>		<b>12,600</b>	<b>12,000</b>	<b>226,400</b>	<b>27,000</b>	<b>22,000</b>	<b>300,000</b>

**2.c. Ability to Leverage** The City of Aiken has a proven ability to leverage funds. The City is funding the Eustis Park brownfields assessment and cleanup using budgeted City funds. Expenditures to date for assessment and cleanup have exceeded \$100,000. Implementation of this grant will leverage 1,200 hours (\$35 hourly rate for a value of \$42,000) of donated time from City of Aiken staff. City of Aiken intends to continue to identify additional financial resources including private donation and other state/federal grants.

Another successful program is the Neighborhood Initiative Program (NIP), a joint venture of the South Carolina State Housing Finance and Development Authority and the SC Housing Corp. (SCHC). The NIP is made possible through the U.S. Department of the Treasury. The City of Aiken, Second Baptist CDC (one of our CBOs for this project), and Nehemiah CRC are partnering together to accomplish NIP goals. The City has been awarded \$365,697 to combat blight. Targeted properties have been purchased by our partners, and the existing structures are being demolished and greened.

In FY2016, the City of Aiken secured \$365,697 from the SC State Housing Finance and Development Authority for property stabilization; and \$200,000 from the SC Park Recreation and Tourism for a Land and Water Conservation Fund project. In FY17, The City received \$500,000 for the Rural Infrastructure Authority for downtown water system upgrades; \$350,000 from the Lt. Governor's Office on Aging for assistance in the construction of the Eustis Community Center; \$346,027 from SCHEC for 319 watershed protection for Shaw's Creek, the City's source for drinking water; and \$11.5M from the State Revolving Loan Fund for the Sand River Sewer Rehab Project.

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We recognize that the strategy of using grant funds is somewhat inflexible with respect to commercial projects that move more at the “pace of business”. As such, one additional powerful leveraging tool available in our State is the SCDHEC Brownfields Cleanup Revolving Loan Fund (RLF). The RLF has fund totaling \$4.25 million available for loan. Local governments, businesses, non-profit organizations, and public and private parties across South Carolina are eligible to apply. The City plans to apply for these funds as necessary for project success.

**3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS a. Engaging the Community**

**i. Community Involvement Plan** As discussed under project description above, the City will prepare a formal Community Involvement Plan (CIP) as a first step in the execution of the proposed project. The CIP will outline planned community engagement activities, schedule, project background, and key players. The first draft will be reviewed by all interested parties. The City has highly motivated and active neighborhood associations (i.e. Crosland Park Neighborhood Association, Toole Hill Neighborhood Association, Second Baptist Community Development Corporation are partners for this effort, see 3.c.ii) who are experienced with these types of projects as evidenced by the NIP (see 2.c). Public input will be sought on assessment and cleanup site selection, assessment activities including any health and safety concerns, cleanup alternatives, and reuse planning through the community engagement approaches described below (see 3.a.ii). The CIP for this project will be compatible with and build on ongoing public involvement from our 2015/2016 input sessions (see 3.a.ii). Under the CIP outreach will be targeted at, and input will be sought from, residents, community organizations, property owners, lenders, business organizations and potential developers. Specific methods for community involvement are outlined in 3.a.ii below. Based on those 2015/2016 input sessions, the City reached out to our community partners in 2016 to announce our intention to apply for brownfields assessment grant funds. The success using the state brownfields approach at the Eustis project was fresh in the community’s mind, thus the support for the federal grant application was overwhelming.

Aiken hopes to build upon the outreach success we have already achieved at our Eustis Park expansion project discussed above. **We envision this project as the model approach for other idle brownfields within the Northside and Downtown target area.** This current project has realized the assessment of pesticides in soils, naphthalenes in soil & ground water, asbestos, and lead-paint. Asbestos within the structures has been abated; demolition is complete; and we are currently developing a Corrective Measures Plan for impacted soils. Recently, the City was awarded a \$350,000 grant from the SC Lt. Gov.’s Office on Aging toward the construction of the Eustis Park Community Center. Northside’s Toole Hill Neighborhood Association was actively involved with the project. Betty Myers, president of the Association, noted to the Aiken Standard newspaper that the center will be for the entire community, not just Toole Hill. Ms. Meyers called the event, “a very special day,” then welled with tears as she wished others, including her late husband, were there to see it.

**3.a.ii. Communicating Progress** As the primary seat of local government, the City is experienced with the process of notifying and engaging the public in high-priority environment and land use decisions. Additionally, we have a business vitality division in the City Manager’s office that is well-versed in developing cooperative partnerships with non-profit organizations, private investors, and state entities. We have already taken community input to heart from our December 2015/January 2016 public input sessions and are applying it to ensure the outreach under this grant is appropriate and effective. We plan to educate stakeholders as part of the

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process of prioritizing and assessing potential brownfields as part of the development of the CIP. Input will be reviewed and, as appropriate, incorporated into the decision-making process.

Aiken has many partnerships with a variety of agencies and community based organizations (CBOs) as shown in the attached letters of support. These existing partnerships will be fostered along with a combination of the following approaches for community engagement:

**Factsheets/flyers** for soliciting continued community engagement. Several of our CBOs have indicated their commitment to help disseminate this information; **Open stakeholder meetings** with City officials, interested members of the public, and organizations in a meeting location convenient to affected residents/organizations. Several of our partner CBOs have offered meeting space; **Open “Field Day(s)”** to invite the public for education and observation of brownfields assessment activities in action. We believe spurring interest in science “in action” within the community aligns with need to increase educational attainment levels identified in the 2016 Benchmark study; **Local media (newspaper & TV)** will be updated periodically with press releases and official notices. In addition to the independent media, we also regularly broadcast on our own to local “Channel 4”, the government access channel; **Social media tools (e.g. Facebook, YouTube, etc.)/Key websites** will be kept up-to-date with the latest information; and **a single City point of contact**, Ms. Joy Gillespie, to ensure continuous public engagement.

Updated information will be disseminated (in as many languages as needed) to impacted residents and CBOs in a timely manner so as to ensure the public is fully aware of the progress of the project. In the process of establishing an open dialogue, environmental justice will be a key objective to provide improved lines of communication with harder-to-reach individuals. Aiken is sensitive to the fact that not all persons affected by this proposal have regular access to a computer. Indeed, based on the educational attainment levels within the target areas, some individuals may not be proficient in computer use, particularly in light of the overabundance of elderly individuals within the target area. As such, we will make every attempt to not over-rely on web-based outreach efforts. The forthcoming senior center at the Eustis Park expansion project may be especially helpful in reaching seniors within the target area. The City will: be sensitive to cultural differences & disabled individuals who want to participate in the execution of this project; proactively collaborate with residents, community leaders and CBOs to ensure we are appropriately responding to comments and information is being provided in a manner that is helpful to the public; and, identify Ms. Gillespie, to handle all inquiries.

**3.b. Partnerships with Government Agencies 3.b.i. Local/State/Tribal Environmental Authority** To save project period time, the City has already assembled a Brownfields Steering Team, comprised of an equitable mix of City employees and community members. The City of Aiken has the following members as the Brownfields Steering Team: from the City, Mr. John McMichael, Jr., Business Vitality Manager; Ms. Joy Gillespie, Capital Projects Sales Tax Manager; Mr. John Poole, City Engineer; and from our CBO partners. Additionally, individuals from Main Street Aiken, Mental Health America Aiken County, Aiken Corporation, & Aiken Corp Housing Committee have all volunteered to act as liaisons between the Brownfields Steering Team and those groups. Procurement of a highly-qualified environmental consulting firm as an extension of our staff to perform the technical aspects of the proposed brownfields tasks is also tantamount.

The SCDHEC is the primary state agency which holds jurisdiction over protection of human health and the environment in the State. The City has an established working relationship with the SCDHEC through our Eustis Park expansion project. SCDHEC will to provide support as technical assistance with regulatory issues, interpretations of South Carolina’s environmental

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rules and laws including cleanup standards, oversight of assessments and cleanup, and help identify other cleanup funding sources. All assessment and cleanup planning activities will be conducted in accordance with applicable regulations. To ensure openness and transparency in the process, Aiken will comply with all SCDHEC programs and make any and all significant amendments to our policies and procedures to be compliant. Given our own positive experience with the program, we plan to actively promote the state brownfields program and incentives to prospective purchasers.

**3.b.ii. Other Governmental Partnerships** We plan to work with Aiken County on the County-owned Former Downtown Hospital project as outlined in Section 1.a.iii. The City, County, and other local governmental agencies are also members of the Economic Development Partnership (EDC). The EDC is a non-profit public-private development corporation focused solely on serving the needs of new and existing businesses in the Aiken, Edgefield, and Saluda Region of South Carolina. The EDC will assist with marketing brownfields to prospective purchasers.

Other potential governmental partners include the SC Department of Archives and History, which can offer input on projects with historical influences; the SC Department of Natural Resources, which can assist in ecological and geological characterization; the SC State Housing Finance and Development Authority and the US Department of Treasury for neighborhood improvement; US DOT and SCDOT for roadways improvement; SC Park Recreation and Tourism for watershed conservation; the SC Rural Infrastructure Authority for water infrastructure upgrades; and the SC Lt. Governor's Office for parks improvements.

**3.c. Partnerships with Community Organizations 3.c.i. Community Organization Descriptions & Roles** Aiken has elicited support of a varied group of CBOs and hopes that additional partnerships will grow out of our stakeholder meetings.

Organization	Type	Role
Hitchcock Woods Foundation	Non-profit	Provide meeting space; assist with gauging success with Sand River evaluations
Crosland Park Neighborhood Association	Neighborhood Association	Provide meeting space; community outreach and communication; assistance in site identification and prioritization
Greater Aiken Chamber of Commerce	Business Alliance	Provide meeting space; community outreach and communication; identification of member willing to serve on advisory panels/boards
Greater Aiken Integrated Trails Foundation	Non-profit	identification of member willing to serve on advisory panels/boards; community outreach and communication; assistance in site identification and prioritization
Second Baptist Community Development Corporation	Faith-based non-profit	identification of member willing to serve on advisory panels/boards; community outreach and communication; assistance in site identification and prioritization
Aiken Council of Neighborhoods	Neighborhood Association	Provide meeting space; community outreach and communication; assistance in site identification and prioritization
Toole Hill Neighborhood Association	Neighborhood Association	identification of member willing to serve on advisory panels/boards; community outreach and communication; assistance in site identification and prioritization
Economic Development Partnership	Non-profit public-private development corporation	Provide meeting space; Provide assistance in marketing the brownfields program to local/regional businesses and developers

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**3.c.ii. Letters of Commitment** See Attachment C for letters from our partners.

**3.d. Partnerships with Workforce Development Programs** Aiken Technical College is a former participant in a 2010 Brownfields Job Training Grant and can assist the City with efforts to promote local hiring and procurement or link members of the community to potential employment opportunities. We envision this organization participating in “Field Day(s)” public outreach to not only promote education, but allow job seekers to gain exposure to what these careers actually entail.

**4. PROJECT BENEFITS a. Welfare, Environmental, and Public Health Benefits** We have identified (1.b.i) welfare concerns related to access to community services, connectivity, crumbling infrastructure, and crime. As an early step to address these issues, the Urban Land Institute’s South Carolina District Council Aiken Technical Assistance Panel convened in Dec. 2014, to focus on helping the City of Aiken revitalize portions of the target area. The results of the panel outlined the following larger issues facing the entire target area: neighborhoods lack amenities and services (daycare, after-school care, family services, healthy restaurants); the area is home to passionate residents committed to making the neighborhoods a better place; there are challenges for new residents to be accepted by the larger community; police presence is welcome; public transit stops may not be in the right location; and the value of land can be more than the structures built on it (blight). We are combating blight through the NIP; however, the brownfields program will focus on blight’s root cause: the site located at the core of each blighted area. By expanding the Farmer’s Market (coupled with continued green infrastructure development and connectivity issues being addressed under other grants) we hope to directly combat the food desert issues in the Northside. Given the high percentage of individuals over 65 within the community, healthy food options are increasingly important. We plan to continue development of state brownfields projects like our Eustis Park expansion to further address the connectivity and access to park facilities; potentially at the former bulk oil facility adjacent to the Aiken Vocational Rehabilitation Office and Work Training Center.

With respect to environmental benefits, we suspect that our brownfields may be currently impacting environmental quality through storm water runoff. If we can control, reduce, or eliminate PCBs, metals, VOCs, SVOCs, and other suspected contaminants at our sites, we anticipate improved water quality within the watershed. Since the Sand River in the Hitchcock Woods is the primary downgradient receiving water body, improvements within the watershed should manifest there. Using Hitchcock studies as a baseline, we can compare water quality indicators from those previous studies with data generated before, during, and after the conclusion of this project and planned green infrastructure improvements. With current studies in-place at the downstream receiving waters (see 1.b.ii), we are confident that we can show eventual measurable benefits to environmental quality.

With respect to public health, sensitive populations in the form of minority groups, low-income populations, and adults over 65 years of age are disproportionally represented within the target area (see Section 1.a.ii.). Many of the residents in the target area live adjacent to our proposed brownfields projects, and those same contaminants potentially impacting the environmental quality in the watershed do not necessarily “stop at the fence” between our brownfields sites and adjoining residences and may be contributing to the negative health effects outlined in 1.b.iii. We can initially incentivize brownfields redevelopment by targeting the former hospital. In addition to proximal residences, the hospital project is adjacent to a senior living facility; redevelopment should address potential impacts to this sensitive population. Our brownfields inventory will also help us prioritize projects in proximity to other sensitive

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populations. The addition of parking may be an intrinsically safe re-use of the former drycleaner and newspaper printing property; as such, we anticipate incorporating parking hardscape as an engineering control to limit contact with impacted media.

**4.b. Economic and Community Benefits** Our residents know that we need to diversify our economy to be less dependent on the Department of Energy Savannah River Site (SRS). In light of the inhibited development in the target area, in terms of unemployment and depressed property values, it is clear that brownfields are playing a role in holding back these areas. Given the 2016 Economic Benchmarking Report conclusion that total government expenses for the City are growing faster than total government revenue, we cannot continue to sustain redevelopment project on our own. Yet, community partners like the Toole Hill Neighborhood Association have already recognized the community benefits of brownfields through the success at the Eustis project (see attached Letter of Support from this CBO). By incentivizing redevelopment, we can show more individual successes like the Eustis project across a wider area.

The initial and most tangible benefit is when redevelopment is realized. The most likely immediate success in this regard is the Newberry Street Parcels, which already has a level of environmental due diligence and planning completed. Not only will the proposed retail spaces provide jobs; the addition of parking will provide better customer access for existing business.

Another benefit is return on investment. We view return on investment as two-fold. The first result being a return of properties to the tax rolls and return of jobs to the community. The metric for gauging success with this outcome is the tax year following redevelopment. The Newberry Street Parcels, Farmer's Market expansion, and hospital projects are poised for success during this time frame. The second is an anticipated upturn in property values. While measurable on a property by property basis, we may not be able to assess the effect our brownfields project has on this metric on the target area as a whole until 2021, since Aiken County only reassesses the values of all properties approximately every five years. This timeframe may be fortuitous, since we have a baseline immediate prior to kickoff of our brownfields project, and a reassessment immediately after the 3-year life of the grant.

**5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE a. Audit Findings**

The City of Aiken has received no adverse audit findings as of the latest report from Mauldin & Jenkins presented to City Council on November 13, 2017. As testament, on December 12, 2016, the City was presented with the Government Finance Officers Association Budget Award.

**5.b. Programmatic Capability** This grant will be administered by Joy Gillespie, Capital Projects Sales Tax Manager, who will also assist contractors in the technical requirements of the program and projects. Ms. Gillespie has the most experience within the City with environmental projects; Ms. Gillespie managed the above-mentioned Eustis Park expansion state brownfields site cleanup. Also assisting with financial requirements will be Kimberly Abney, Finance Director for the City Aiken. Ms. Abney and her accounting staff will assist in the oversight of expenditures for this grant. Assistance with site identification will come from Mr. John McMichael, Business Vitality Manager for the City of Aiken, who manages the economic development agent for the City. The City will also solicit through its established procurement procedures for expertise and performance if any additional assistance from contractors and experts is needed.

**5.c. Measuring Environmental Results: Anticipated Outputs/Outcomes** In order to evaluate its progress, the City will measure and track/document the listed outputs and outcomes. Once a site has been determined to be eligible, it will be entered into the Assessment, Cleanup, and Redevelopment Exchange System (ACRES). ACRES profiles will be updated following

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completion of Phase I and II ESAs, QAPPs, ABCAs, remediation, and/or redevelopment activities. To track and measure progress the City will: (1) evaluate project achievements against those incorporated into the grant application and work plan; (2) determine if the project has resulted in an improved site (acquisition/transfer/redevelopment); and (3) report the outputs of the grant in quarterly and annual reports to the EPA and track the following outcomes and outputs to a regularly updated project spreadsheet. Measurable outputs: CI drafted, number of community meetings held, number of ABCAs completed, number of brownfields identified, QAPPS completed, number of Phase I and II ESAs completed, number of sites where cleanup planning was conducted. Measurable outcomes: number of acres of land assessed, number of jobs created/retained and tax revenue generated; number of acres of property remediated; quantity of leveraged funding (public and private), number of acres of property redeveloped, number of new jobs and tax revenue generated; quantity of redevelopment investment value, and acres of parks and greenspace preserved and created. The City will adjust its project approach if it becomes evident that the project is not generating the expected outputs/outcomes.

**5.d. Past Performance and Accomplishments 5.d.ii. Has Not Received an EPA Brownfields Grant but has Other Federal or Non-Federal Assistance Agreements 5.d.ii.1. Purpose and Accomplishments** Within the past five years, City has been awarded and successfully managed, or is managing to the desired outcome, over \$5 million between Federal expenditures and State expenditures. The City of Aiken has not previously received an EPA Brownfields Grant, but has received assistance through numerous other federal, state and local grants. Selected grants/accomplishments are summarized in the following table:

Assistance Program	Awarding Agency	Amount Awarded	Funds Remaining	Award Date	Grant Accomplishments
319 Non-Point Source Program	SCDHEC	\$346,027	\$346,027	2017	Watershed Improvements
SC Rural Infrastructure Authority	SC Rural Infrastructure Authority	\$500,000	\$500,000	2017	Downtown Water System Improvements
SC Lt. Governor's Office	SC Lt. Governor's Office – Office on Aging	\$350,000	\$350,000	2017	Senior Center Construction
SC Park Recreation Tourism	National Parks Service - LWCF	\$200,000	\$200,000	2016	Park Rehabilitation
Finance and Development Authority	SC State Finance and Development Authority	\$365,697	\$0.00	2015	Property Stabilization

**5.d.ii.2. Compliance with Grant Requirements** The City is in compliance with internal and third party audit requirements and with all terms and conditions from each award. The City is meeting all reporting requirements, is in compliance with the workplans and on or ahead of schedule for each of the remaining open grants. The City has highly skilled staff monitoring grant activities to ensure compliance as annually recognized in the audit.

**City of Aiken, South Carolina**  
**FY18 US EPA Community Wide Assessment Grant Application**

**1. Applicant Eligibility**

City of Aiken, South Carolina is eligible to apply for EPA Brownfields Assessment Grant funds because it is a local unit of government as defined under.

- 40 CFR Part 31.1 (cities)

**2. Community Involvement**

Letters of Support from Community-Based Organizations are attached to the Narrative Proposal. As the primary seat of local government, the City is experienced with the process of notifying and engaging the public in high-priority environment and land use decisions. Additionally, we have a business vitality department that is well-versed in developing cooperative partnerships with non-profit organizations, private investors, and state entities. We have already taken community input to heart from our December 2015/January 2016 public input sessions and are applying it. We plan to educate stakeholders as part of the process of prioritizing and assessing potential brownfields. Input will be reviewed and, as appropriate, incorporated into the decision-making process. A more complete picture of our community involvement plan is included in the Narrative Proposal portion of this application. This grant was placed on the City Council agenda for discussion on October 30, 2017 (attached hereto).

**3. Site Eligibility and Property Ownership Eligibility. NOT APPLICABLE**

# Application for Federal Assistance SF-424

## \* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

## \* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

## \* If Revision, select appropriate letter(s):

## \* Other (Specify):

## \* 3. Date Received:

11/16/2017

## 4. Applicant Identifier:

## 5a. Federal Entity Identifier:

## 5b. Federal Award Identifier:

## State Use Only:

## 6. Date Received by State:

## 7. State Application Identifier:

## 8. APPLICANT INFORMATION:

### \* a. Legal Name:

City of Aiken

### \* b. Employer/Taxpayer Identification Number (EIN/TIN):

57-6000219

### \* c. Organizational DUNS:

0301131040000

## d. Address:

### \* Street1:

135 Laurens Street, Sw

### Street2:

### \* City:

Aiken

### County/Parish:

### \* State:

SC: South Carolina

### Province:

### \* Country:

USA: UNITED STATES

### \* Zip / Postal Code:

29801-3911

## e. Organizational Unit:

### Department Name:

### Division Name:

## f. Name and contact information of person to be contacted on matters involving this application:

### Prefix:

### \* First Name:

Joy

### Middle Name:

### \* Last Name:

Gillespie

### Suffix:

### Title:

## Organizational Affiliation:

### \* Telephone Number:

8036432123

### Fax Number:

### \* Email:

jgillespie@cityofaikensc.gov

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

**Type of Applicant 2: Select Applicant Type:**

**Type of Applicant 3: Select Applicant Type:**

**\* Other (specify):**

**\* 10. Name of Federal Agency:**

Environmental Protection Agency

**11. Catalog of Federal Domestic Assistance Number:**

66.818

**CFDA Title:**

Brownfields Assessment and Cleanup Cooperative Agreements

**\* 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-17-07

**\* Title:**

FY18 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

**13. Competition Identification Number:**

**Title:**

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

City of Aiken FY 18 US EPA Community-wide Brownfields Assessment Grant application - Downtown and Northside Community

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

**Add Attachment****Delete Attachment****View Attachment****17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="300,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="300,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

**Add Attachment****Delete Attachment****View Attachment**

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: \* Signature of Authorized Representative:  \* Date Signed:





CLINTON  
*South Carolina*

R04-18-A-074

November 13, 2017

Robert T. McLean  
Mayor

Dale Satterfield  
Interim City Manager

Ms. Barbara Alfano  
Brownfield Coordinator  
Environmental Protection Agency, Region IV  
Atlanta Federal Center, 10th Floor  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-8960

RE: City of Clinton, South Carolina, Brownfields Assessment Grant Application

Daniel O. Cook, Jr.  
City Council Member

Dear Ms. Alfano:

Shirley Y. Jenkins  
City Council Member

Gary I. Kuykendall  
City Council Member

Robbie N. Neal  
City Council Member

Ronnie D. Roth  
City Council Member

Jimmy M. Young  
City Council Member

The City of Clinton, South Carolina, is pleased to submit the enclosed application for an Environmental Protection Agency (EPA) Brownfields Community-Wide Hazardous Substances and Petroleum Assessment Grant. The City was chartered in 1852 as a vibrant railroad town, and at the turn of the century, quickly developed a strong textile-manufacturing based economy. Yet, like many textile communities in the southeast, we have experienced an overall industry decline and a closure of multiple plants in the area.

We are located in Laurens County, which is part of a 10-county economic development region in South Carolina called the "Upstate." While some portions of the Upstate, such as Greenville-Spartanburg, are experiencing a recent economic recovery, Clinton and Laurens County have not experienced such success. Clinton remains characterized by empty storefronts, multiple brownfields, a depressed housing market, and a large population living in poverty— all making it difficult to attract new industries with quality jobs and a talented workforce.

Jerre Threatt, AICP  
Assistant City Manager

Joey Meadors  
Director  
Dept. of Administrative  
Services

Renee Morrow  
Chief Financial Officer

Robin Morse  
Director  
Dept. of Public Safety

Dale Satterfield  
Director  
Dept. of Public Works

Our targeted area for the brownfields assessment project is the incorporated area of the City and areas just outside the city limits impacting the City's residents. Of particular interest is the former Clinton Mill, Industrial Supply Warehouse Complex, and Lydia Mill, which were some of the largest employers in our community before they shut down. Removing the barriers created by these brownfields is critical to the overall health of our city. Without doing so, the City and the targeted population will not be able to take advantage of the economic recovery being experienced in other parts of the region.

a. APPLICANT IDENTIFICATION: City of Clinton, South Carolina  
Post Office Box 748  
Clinton, South Carolina 29325

City of Clinton, South Carolina  
Post Office Drawer 748 • 211 North Broad Street, Suite A  
Clinton, South Carolina 29325-0748  
(864) 833-7500 • [www.cityofclintonsc.com](http://www.cityofclintonsc.com)

b. FUNDING REQUESTED:

- i. Grant Type: Assessment
- ii. Assessment Grant Type: Community Wide
- iii. Federal Funds Requested: \$300,000
- iv. Contamination: Hazardous Substances \$200,000/Petroleum \$100,000

c. LOCATION: City of Clinton, Laurens County, South Carolina

d. PROPERTY INFORMATION: N/A – community-wide proposal

e. CONTACTS:

- |   |  |
|---|--|
| i. Project Director:  | ii. Chief Executive:   |
| Jerre F. Threatt  | I. Dale Satterfield  |
| Assistant City Manager  | Interim City Manager   |
| City of Clinton   | City of Clinton  |
| Post Office Box 748   | Post Office Box 748  |
| Clinton, South Carolina 29325   | Clinton, South Carolina 29325  |
| Phone: (864) 833-7508   | Phone: (864) 833-7505  |
| Fax: (864) 833-7533   | Fax: (864) 833-7533  |
| Email: <a href="mailto:jthreatt@cityofclintonsc.com">jthreatt@cityofclintonsc.com</a> | <a href="mailto:dsatterfield@cityofclintonsc.com">dsatterfield@cityofclintonsc.com</a> |

f. POPULATION:

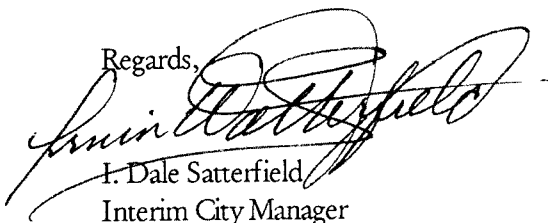
- i. 8,561 (2015 American Community Survey 5 Year Estimates 2011-2015)
- ii. The City of Clinton is a municipal form of government.
- iii. The City of Clinton is located in Laurens County, South Carolina, and has not experienced persistent poverty over the past 30. The 2015 Small Area Income and Poverty Estimates for Laurens County indicated that 18.9% of individuals in Laurens County are living in poverty.

g. REGIONAL PRIORITIES FORM/OTHER FACTORS CHECKLIST: The Regional Priorities Form and Assessment Other Factors Checklist are attached.

h. LETTER FROM THE STATE OR TRIBAL ENVIRONMENTAL AUTHORITY: Ms. Daphne Neel, Bureau Chief for the South Carolina Department of Health and Environmental Control's (SCDHEC) Bureau of Land and Waste Management, issued a letter acknowledging this grant proposal and the Department's support of the planned community-wide assessment activities for the City of Clinton. The SCDHEC letter is included as an attachment.

Thank you for your time and consideration. If you should have any questions, please do not hesitate to contact me or Jerre Threatt, Project Director.

Regards,



I. Dale Satterfield  
Interim City Manager

### Appendix 3 - Regional Priorities Form/Other Factors Checklist

Name of Applicant: City of Clinton, South Carolina

#### Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s):

N/A

Page Number(s):

#### Assessment Other Factors Checklist

Please identify (with an **X**) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	X, P. 2
The jurisdiction is located within, or includes, a county experiencing "persistent poverty" where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	X, P. 10,11
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	



November 10, 2017

Barbara Alfano  
Region 4 Brownfields Coordinator  
United States Environmental Protection Agency  
Resource Conservation and Restoration Division  
61 Forsyth Street SW  
Atlanta, Georgia 30303-8960

RE: EPA Brownfields Community-Wide Assessment Grant  
City of Clinton, South Carolina

Dear Ms. Alfano:

The South Carolina Department of Health and Environmental Control, the State's environmental authority, acknowledges and fully supports the City of Clinton's application for a Brownfields Community-wide Assessment Grant. The grant will facilitate environmental assessment of two former Mill Sites, an industrial storage area, and numerous other sites in the heart of Downtown Clinton, South Carolina.

The Department appreciates your consideration of the application and hopes for a favorable outcome. Your positive response will assist the City in its efforts to revitalize properties in the community. If you have any questions or need additional information, please contact Robert Hodges of my staff at (803) 898-0919.

Sincerely,

A handwritten signature in cursive script that reads 'Daphne Neel'.

Daphne Neel, Chief  
Bureau of Land and Waste Management

cc: Chris McClusky, Upstate EA Anderson  
Robert Hodges, Manager, Brownfields Program

## **1. COMMUNITY NEED**

### **a. Target Area and Brownfields**

#### **i. Community and Target Area Descriptions**

The City of Clinton, South Carolina is a small town of only 10 square miles, yet is the second largest municipality in Laurens County, a mostly rural county. It is situated at the junction of two interstate highways (I-26 and I-385), about midway (about an hour drive) between the urban areas of Greenville-Spartanburg, to the north, and Columbia, to the south. The City of Clinton was chartered in 1852 as a vibrant railroad town, and at the turn of the century, quickly developed a strong textile-manufacturing based economy. Yet, like many textile communities in the southeast, Clinton has experienced an overall industry decline and a closure of multiple plants in the area. For over a century, Clinton Mills served as the primary employer and center of the community for Clinton residents, operating two mills in the area, Lydia Mill and Clinton Mill—both surrounded by traditional mill villages. According to the Clinton Museum, “Lydia was a self-contained and a very distinct village. A real ‘Mill Hill’ you could tell where it started and ended as it didn’t flow into any other community.” The closure of Lydia Mill in 1981 destroyed Lydia. What once was a vibrant mill village is now a depressed blighted area, disconnected from the rest of the Clinton community. When the Clinton Mill closed in 2001, over 800 employees were put out of work, and the surrounding neighborhood began to decline as well. In 2002, a headline in The Charlotte Observer read, “Town’s foundation crumbles. Clinton, SC struggles to survive economically and emotionally...Trains don’t stop here anymore. Police officers roll through the mill village scanning for trouble. And about the only place getting busier is the food bank.”

Laurens County is considered part of a 10-county economic development region in South Carolina called the “Upstate.” While some portions of the Upstate, such as Greenville-Spartanburg, are experiencing a recent economic recovery, Clinton and Laurens County have not experienced such success. Clinton remains characterized by empty storefronts, multiple brownfields, a depressed housing market, and a large population living in poverty—all making it difficult to attract new industries with quality jobs and a talented workforce. With people relocating to other areas to find jobs, the City’s population has declined. In 2000, Clinton’s population was 9,137; by the 2010 census, the population had declined to 8,489, a 7% decrease. Between 2000 and 2014, local school enrollment fell by 13% from 3,587 to 3,112 students. The targeted area for the brownfields assessment project is the incorporated area of the City of Clinton and areas just outside the city limits impacting the City’s residents. Removing the barriers created by brownfields is critical to the overall health of Clinton. Without doing so the City and the targeted population will not be able to take advantage of the economic recovery being experienced in other parts of the region.

#### **ii. Demographic Information and Indicators of Need**

The City of Clinton has a small population of 8,561. The demographics indicate an economically depressed area impacting many sensitive and environmental justice populations. Over 40% of residents are minorities, mostly African-American, substantially higher than at the county, state and national levels. Over 40% of the population is composed of women of childbearing age, and 7% are young children, both substantially higher than found in the larger geographic areas. While the City has a slightly higher percentage of individuals with a bachelor degree than the county, most likely due to the presence of Presbyterian College, it is still less than the percentage seen at the state level. The per capita and median household incomes, \$15,119 and \$29,342, respectively, are significantly lower than those found in the county, state or nation. The unemployment rate is higher in Clinton and Laurens County than in the state or nation. Over 36% of individuals, and nearly half of the families with children, live in poverty, approximately two times that of those same populations in the county and state. Rental homes represent 57.5% of the housing stock; and median home values in the city are substantially lower than that seen at the state level. Clinton has no public transportation and does not even have a local taxi service. Further, 4.5% of the residents in Clinton have no car, compared to 2.5% in Laurens County and South Carolina.<sup>1</sup> The City of Clinton lacks job, affordable housing, and public transportation.

---

<sup>1</sup> <http://Datausa.io>, November 2017

**City of Clinton, SC Demographic Information Table**

Demographic	City of Clinton	Laurens County	South Carolina	United States
<b>Social Statistics</b>				
Population	8,561	66,389	4,777,576	316,515,021
Minority (Alone)	41.5	29.7	32.8	26.4
African-American (Alone)	39.1	25.4	27.2	12.6
Hispanic (Alone)	1.7	4.3	5.3	17.1
Children (5 -under)	7.3	6.0	6.1	6.3
Elderly (65-over)	17.2	16.2	15.2	14.1
Women of Child Bearing Age	41.7	36.3	38.2	39.5
High School Graduate or Higher	75.6	79.2	85.6	88.8
Bachelor Degree	20.0	14.6	25.8	33.1
<b>Economic Statistics</b>				
Individuals Below Poverty Level	36.4	20.9	17.9	15.5
Families with Children Below Poverty	46.9	27.9	22.0	18.0
Per Capita Income	\$15,119	\$20,072	\$24,604	\$28,930
Median Household Income	\$29,342	\$38,515	\$45,483	\$53,889
Unemployment Rate	10.7	10.7	9.5	8.3
Median Home Value	\$92,100	\$83,900	\$139,900	\$178,600
Percent Vacant Homes	14.1	17.9	16.5	12.3
Percent Rental Homes	57.5	28.4	31.4	36.1
Source: Census.gov, 2015 U.S. Census, American Community Survey, 5-Year Estimates, September 2017				

### **iii. Brownfields and Their Impacts**

In preparation for this application, the City of Clinton identified multiple potential brownfield sites impacting the community. Out of these, three sites are considered a priority, based on previous community concerns and potential for redevelopment: Clinton Mill; Lydia Mill; and Industrial Supply.

The **Clinton Mill** opened in the late 1890s and closed in 2001, producing woven cotton, polyester, and cotton/polyester blend greige, printcloth and broadcloth fabrics. The mill site is located within the center of the original residential mill village, surrounded on all sides by single-family homes, and only a 10-minute walk from the Main Street district. The historic site of the old Martha Dendy School, a primary school originated in 1883 by freed slaves, is located just across the street from the mill site as well. The site is 48.75 acres, and partially surrounded by a tall fence, but not completely secured. Much of the mill structures are intact; but some windows and doors are no longer present. Today, portions of the property are used by a company that manufactures wood-shaving horse bedding for a national agriculture and livestock supply retailer. Large stored piles of mulch and wood chips are often seen spilling out of the building; and there are many tractor-trailer containers parked on the site. There is a large green space with a retention pond. The City receives constant complaints from residents regarding the aesthetics of the site, as well as concerns for public safety. Scott Shiftet, Clinton's Fire Commander, reported that the fire department has responded to a number of calls, due to piles of woodchips or sawdust spontaneously combusting, arson from vandals setting fire to supplies on the loading dock, and a fire in a tractor trailer from a malfunctioning engine. In at least one instance, the fire department had to spray water on existing above ground fuel storage tanks on the site to prevent them from exploding. Crystal Roberts, Clinton's Police Commander, reported that calls come regularly from the owner of Clinton Mills and those who live in the neighborhood. The mill is a haven for trespassing, drug use, burglary, and grand larceny. Most recently on October 5, the Clinton police responded to a call of trespassers which were found to be two juveniles who were walking around in the building, because "their friends had said that this building was fun to walk around in". Potential contamination concerns associated with the past use of this site include PAHs from coal fired boilers, heavy metals from dyes, solvents from servicing equipment, and petroleum constituents from storage tanks. The youth having "fun" walking around in Clinton Mill are at risk to exposure to these harmful contaminants.

The **Lydia Mill** site is 17.13 acres and located to southwest of the City. Although the old mill site is in the unincorporated area of the county, it abuts the old Lydia mill village within the City limits. Single-family homes from this neighborhood face the site from across the street (less than 100 feet away). The site is partially fenced, but not securely contained. Lydia Mill was a cotton mill that operated between the years 1895 and 1981. The mill structure has undergone various stages of demolition, and the entire site is littered with large stacks of demolition debris. The property contains remnants of the original mill structure, which appear structurally unsound, and a large retention pond. There is evidence that suggests illegal dumping on the site as well. The mill site that used to be the heart of an active community is now considered “haunted ruins.”<sup>2</sup> Scott Shiflet reports that homeless people often occupy the stairwells in the towers on the site. The Clinton fire department has responded to several fires in the towers suspected to be from the homeless setting fires to stay warm. He also reported that from the police side, the Lydia area is considered “the roughest area” in the City. Potential contamination concerns associated with the past use of this site include PAHs from coal fired boilers, heavy metals from dyes, solvents from servicing equipment, and petroleum constituents from storage tanks. The homeless seeking shelter in Lydia Mill risk exposure to these contaminants.

The **Industrial Supply** site is an old warehouse complex that occupies an entire city block and makes up the City’s downtown warehouse district. Composed of 10 buildings, the site fronts an active railroad line and a busy four-lane highway. The nearest residential areas are within 1/8-mile from the site. Uses dates back to the 1850s, when the site served as the train depot where everything coming into the City was offloaded, including farming and cotton industry materials. Other uses on the site include a former service station that had hydraulic lifts. For years the warehouses have been mostly vacant and unkempt. Currently, only one of the buildings is occupied. Potential concerns include hazardous substances associated with the use of herbicides and pesticides, constituents of agricultural chemicals, fertilizers and other items stored in the warehouses, and PCBs and petroleum constituents from hydraulic lifts and engine servicing.

At least eleven other brownfield sites have been identified as detailed in the following table. Sensitive populations may be inadvertently exposed to lingering contamination associated with the numerous brownfield properties, particularly in the old mill neighborhoods. Environmental assessment is needed to determine to what extent the uses have impacted the sites and to facilitate the sale and redevelopment of these properties. Left unmitigated, these potential hazards pose a threat to current residents and hinder the future reuse of the properties.

#### Other Potential Brownfields Sites

Site	Extent (Acres)	Nature of Site	Proximity to Residents	Potential Negative Environmental Impacts
207 Pitts Street	0.28	Previous uses include hardware store, grocery store and possibly downgradient of dry cleaners	600 feet	Well tests have confirmed chlorinated solvents in groundwater; Blight on neighborhood; safety hazards
103 N. Adair Street	4.88	Former CWS Guano Company fertilizer plant	100 feet	Structures cleared, potential soil and groundwater contamination from fertilizer production
801 E. Main Street	5.10	Former C&T Manufacturing Plant	60 feet	Contaminants from former use as a sewing plant, likely to be solvents from equipment cleaning, at a minimum; Blight on neighborhood
505 Main Street	0.90	Former service stations and automotive garages	45 feet	Petroleum contaminants, PCBs from hydraulic lifts, solvents; Blight on neighborhood
204 E. Carolina Ave.	0.46		190 feet	
201 S. Broad St.	0.42		315 feet	
201 S. Woodrow St	0.38		90 feet	
114 N. Adair Street	0.32	Abandoned gas stations	45 feet	Petroleum contaminants; Blight on neighborhood; Public safety hazards.
700 Musgrove St.	0.43		125 feet	
206 Davidson Street	3.09	Former Manufacturing Plant	50 feet	Contaminants from use as a shirt factory, likely to be solvents from equipment cleaning & petroleum from fuel storage; Blight on neighborhood; Public

<sup>2</sup> <http://www.hauntedplaces.org/item/lydia-mill-ruins/>

Site	Extent (Acres)	Nature of Site	Proximity to Residents	Potential Negative Environmental Impacts
877 Torrington Road	20.0	Former hardwood floor manufacturer the City is considering annexing and acquiring	100 yards	safety hazards PAHs & petroleum contaminants from heating sources, solvents from treating, finishing wood

## **b. Welfare, Environmental, and Public Health Impacts**

### **i. Welfare Impacts**

The brownfields in Clinton are substantial blight on the neighborhoods and entire community. Residents in the old mill villages complain at city council meetings about the aesthetics of the sites. They are concerned for the safety of themselves and their children. Unsecured, the Clinton and Lydia Mill sites are attractions to both neighborhood children and the homeless. Unsafe structural items and potential contaminants in debris pose great risks to both of these sensitive populations. Residents in the Clinton Mill neighborhood are concerned about the fires that occur on site. One individual said, “If the Clinton Mill were to catch on fire, it would take out the entire neighborhood.” With over 36% of the individuals, and nearly 47% of families with children, living below the poverty line, residents have limited resources to move to safer areas of the city.

Nancy Dove, a regular volunteer at United Ministries, sees the need daily. The United Ministries provides financial assistance for utility bills to about 30 to 35 families a week, provides food to about 80 families a week, and prepares weekend food backpacks for 150 children each week of the school year. She often transports home those who come because of the difficulty they would have walking home with the boxes of food. She says she usually transports them to “dilapidated trailers”. Since September 2016, Marie Roberson and Jeannie Browning, wife of the minister of Calvary Baptist Church in the Clinton mill village, have driven around in the Clinton Mill Village on a weekly basis to pray for the community. If someone is outside and waves, they stop and pray with them. They ask them to come to church, and tell them where they may find help with their problems. They see a “sense of hopelessness” in the area with addiction problems, relationship problems, and people living paycheck to paycheck. The US Department of Agriculture (USDA) has designated many parts of the City of Clinton as a food desert. The area where many of the brownfields are located, including Clinton Mill, Industrial Supply and Lydia Mill, are located in low-income urban census tracts, where a significant share of residents live more than 1 mile from the nearest supermarket. USDA estimates almost 20% of households in that area, a total of 380, are without vehicles and more than 1/2 mile from a supermarket.<sup>3</sup> Public transportation is not available in Laurens County, making access to community services and essentials, such as healthcare and healthy food, extremely challenging for the targeted population.

### **ii. Cumulative Environmental Issues**

In addition to the presence of brownfield sites discussed earlier, Clinton’s residents must deal with various other cumulative environmental issues. The Clinton area has 12 facilities known to have produced and released air pollutants, 2 State superfund sites, 2 facilities that have reported toxic releases, 22 facilities reported to be hazardous waste generators, and 2 facilities permitted to discharge wastewater to local rivers.<sup>4</sup> With the railroad running through the heart of the City, residents and businesses are impacted by the constant noise and vibrations from the passing trains. The line that runs along the Industrial Supply site is estimated at 30 trains a day. Diesel exhaust from locomotives may contain contaminants, carcinogens, smog-forming compounds and fine particulate matter that contribute to poor air quality. Due to the overburdening from existing sources of pollution, EPA rates many areas in Clinton, particularly in areas where the brownfields are located, in the top 50-90 percentile in the nation for a variety of environmental justice issues.<sup>5</sup> On top of all that, the community has had to live with a substandard sewer system for years. The City entered into a voluntary consent order with the South Carolina Department of Health and

<sup>3</sup> USDA Economic Research Service, <https://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas/>

<sup>4</sup> US EPA Envirofacts online website, November 2017

<sup>5</sup> EPA Environmental Justice Online Tool, <https://www.epa.gov/ejscreen>

Environmental Control (SCDHEC) due to mutual concerns. Per the consent order, the City will conduct a complete audit of the sewer system and work with SCDHEC to develop a response plan. We have hired a consulting engineering firm, completed a Capacity, Management, Operation, and Maintenance (CMOM) audit and developed a response plan; however, it is estimated that it will take several years to fully repair the system without significant support.

### **iii. Cumulative Public Health Impacts**

A March 30, 2016, article in *The Clinton Chronicle* recounted the fond memories of an elderly citizen's childhood: "Once upon a time there was a stream...at Clinton Mills...that flowed for a distance past [Pucketts Spring]...on to...Beard's Fork Creek. The stream was a favorite place for boys who lived on...the mill hill. I was one of those boys who spent many days playing in the somewhat polluted water of that stream. I grew up before the advent of antibiotics and I reckon it is something of a miracle that I did not die of some dread disease never reaching adulthood." Today, potential environmental exposures from the old Clinton Mill site, as well as other brownfields, continues to threaten sensitive populations. In 2015, the entire Lydia Mill area was voluntarily evacuated because of flooding. Such incidences draw concern of debris and environmental distress due to potential contaminants from the mill site coming into the streets and residents' properties.

Cindy Perry, Executive Director of the Good Shepherd Free Medical Clinic for Laurens County, sees the direct impact from the closure of the mills and other business on the need for public health services. She states that while the job crisis has improved some, the jobs that are available are often part-time (20 hours or less a week), so health benefits are not provided. She has not seen any reduction in the need for free health care.

Cancer and asthma are common consequences of environmental exposure to the contaminants of concern identified in the table of potential brownfield sites. EPA rates areas where brownfields are located in Clinton in the top 70-90 national percentile on the Environmental Justice Index for cancer risk and respiratory illnesses.<sup>6</sup> In calendar year 2016, there were 13 hospital admittances (rate of 151.85 per 100,000) and 93 emergency room visits (rate of 1086.32 per 100,000) for asthma in zip code 29325 (Clinton) vs. 60 admittances (rate 90.37) and 319 ER visits (rate 480.50) in Laurens County vs. 4,594 admittances (rate 96.15) and 25,650 ER visits (rate 536.88) in SC.<sup>7</sup> Also, from 2010-2014, a total of 436 new cases of cancer occurred in Clinton, while 415 cases were expected. In the same period, 207 cancer deaths occurred in Clinton, while 171 deaths were expected.<sup>8</sup> Poor air quality is linked to premature death, cancer, and long-term damage to respiratory and cardiovascular systems. In 2012, the annual average daily amount of fine particulate matter in micrograms per cubic meter (PM2.5) in Laurens County was 10.4 µg/m3. This is greater than the top performing area of the US of 6.7 µg/m3 and exceeds the SC. Obesity, unhealthy diet, and not getting enough exercise create higher risks for any type of cancer, but particularly with colon/rectum and pancreas cancers.<sup>9</sup> The Centers for Medicare and Medicaid Services report that Adult diabetes for Laurens County is 28.2%.<sup>10</sup> Limited access to healthy food may be a major contributor to this issue as discussed in Section 1.b.i., Welfare Impacts.

### **c. Financial Need**

#### **i. Economic Conditions**

The current economic situation in Clinton presents significant funding challenges with the City experiencing lower revenues in some areas and steadily increasing operational costs. The City provides a wide range of services, including public safety, planning and developmental services, sanitation, street maintenance, cemeteries, cultural and recreational activities, and community development. In addition to these general government activities, the City also provides and maintains water, sewer, and electric utilities both inside and outside of the incorporated area. Typical revenue sources include property taxes, utilities, fees and licenses.

<sup>6</sup> EPA Environmental Justice Online Tool, <https://www.epa.gov/ejscreen>

<sup>7</sup> SC Dept of Revenue & Fiscal Affairs, Health Data Statistics, October 2017

<sup>8</sup> SCDHEC, Cancer Data Registry, November 2017

<sup>9</sup> American Cancer Society [www.cancer.org](http://www.cancer.org)

<sup>10</sup> [http://download.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/Chronic-Conditions/Downloads/cc\\_prev\\_state\\_county.zip](http://download.cms.gov/Research-Statistics-Data-and-Systems/Statistics-Trends-and-Reports/Chronic-Conditions/Downloads/cc_prev_state_county.zip), as cited on cms.gov, November 2017.

Property taxes account for only 12% of the City's budget, due to depressed market values and the presence of large tax-exempt institutions, such as Laurens County School District 56, Whitten Center, Presbyterian Home, and Presbyterian College that represent approximately 50.2% of all property in the City.<sup>11</sup> One quarter of the City's general fund budget currently is supported by utility revenue fund transfers that put additional pressures on the utility operations, particularly with customer usage remaining stagnant, or slightly declined, over the past 10 years. In 2008, the City serviced 4,388 water/sewer customers; in 2016 that number was reduced to 4,043.<sup>12</sup>

Planning for FY 2017/2018 budget was a significant challenge for City staff due to the continued slow economic growth coupled with the fact that many deferred maintenance items and capital equipment replacements must be addressed in order to ensure proper service delivery going forward. Many of these items were deferred due to the economic situation for several years. The most significant challenge faced in preparing the budget was the need to continue to provide revenue in the sewer utility to fund the expected capital improvement costs associated with the Sanitary Sewer Consent Order the City of Clinton entered into with the SCDHEC in 2014, described in Section 1.b.ii. The City and the outside engineering firm are working to identify the needed improvements and estimated costs. The City will look to a variety of sources to fund the needed improvements and repairs—including utility bonds, state revolving loan funds, and grants from CDBG and USDA Rural Development programs—funds that otherwise could be used for other community development activities, such as brownfield assessment and redevelopment. The City also will have to provide matching funds and allocate staff time for the project. All of this will place additional financial burdens on other operations.

The brownfields assessment grant is critical to Clinton's revitalization success. The City, and Laurens County in general, have not experienced the rapid economic recovery seen in other parts of the Upstate region, and the prevalent brownfields make it difficult to create a quality of life that is attractive to industry and business growth. Most recently, yet another closure is impacting Clinton. CB&I, a pipe fabricator located between Clinton and Laurens, is closing. Between now and March 2018, 250 workers are being laid off.

## **ii. Economic Effects of Brownfields**

The City once had a traditional textile-manufacturing base and has been hit especially hard by the loss of textile jobs. The closure of Lydia Mill in the early 1980s destroyed a once vibrant mill village. As recently as 2001, when Clinton Mills closed, over 800 employees lost their jobs,<sup>13</sup> and the surrounding neighborhood began to decline as people moved away to find employment. The economic slowdown in the past few decades also has hurt the other businesses in Clinton and Laurens County, leaving many vacant storefronts in downtown along the commercial corridors. Now, CB&I is closing and eliminating 250 jobs. As discussed in Section 1.a.i, many parts of the Upstate region of South Carolina, particularly in the urbanized Greenville-Spartanburg-Anderson area, are experiencing a strong economic recovery. Unfortunately, the targeted area of Clinton has not benefitted from this new growth. As an example, between 2011 and 2015, while the per capita income in Greenville County steadily increased from 110% to 111% of that at the state level, Laurens per capita income reduced from 84% to 81.5% of that at the state level. In Clinton, 36.4% of the population remains in poverty. Another indicator is the increase of Qualified Census Tracts (QCTs) for low-income tax credits, where at least 50 percent of households make below 60 percent of the Area Median Gross Income (AMGI) or have a poverty rate of 25% or more. The City of Clinton is located in three census tracts. In 2016, HUD designated two of these tracts as QCTs; effective January 2017, all three tracts are currently considered QCTs.<sup>14</sup>

Clinton is poised, with its strategic location and community partners, to attract new industry with quality jobs for the targeted population. The City is marketing a multi-phased corporate/industrial park located in close proximity to I-26. Basic infrastructure, such as curb, gutter and roads are in place, but no development has occurred. To potential investors, Clinton

<sup>11</sup> Laurens County Tax Assessor Data as cited in City of Clinton's 2015 Audit

<sup>12</sup> City of Clinton Annual Budget Fiscal Year 2016-2017, Clinton, SC, <http://www.cityofclintonsc.com>

<sup>13</sup> Office of Chief Economist and The International Trade Division of the American Textile Manufacturers Institute. *Crisis in US Textiles*, 2001, <http://www.libertyparkusafd.org/Hamilton/US%20Manufacturing/Crisis%20in%20US%20Textiles.pdf>

<sup>14</sup> US HUD, 2016 and 2017 Small DDAs and QCTs, [https://www.huduser.gov/portal/sadda/sadda\\_qct.html](https://www.huduser.gov/portal/sadda/sadda_qct.html), October 2017

looks good on paper. Yet, when they visit the community to consider a location for their business, they see a downtown of empty storefronts, struggling neighborhoods of substandard housing, and a prevalence of brownfield properties. The impression is created despite staff carefully selecting routes to avoid the most blighted properties, such as Lydia Mill. This makes it extremely difficult to recruit new industries and to grow the workforce to support growth. Meanwhile, lost tax base, stagnant utility usage, depressed market values and the burdens of public safety responses to the brownfields continue to have a negative impact on the City's economic health.

## **2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS**

### **a. Project Description, Timing and Implementation**

#### **i. Project Description and Alignment with Revitalization Plans**

The brownfields assessment grant project will fund the identification, assessment and cleanup planning that will ultimately result in positive redevelopment of brownfield sites that are creating an impediment to the economic and community health of the targeted population. The project will focus on the redevelopment of sites for economic development, downtown revitalization, and affordable housing opportunities. This aligns well with, and furthers, the City's 2015 Economic Development Strategic Plan, which recommends recruiting new businesses by mapping Clinton's under-utilized and vacant properties (i.e. brownfields) to identify opportunities for redevelopment in areas where infrastructure (roads, utilities, and rail) already exists. The Plan also recommends continued investment in downtown and gateways into the City. The City is completing its latest phase of downtown streetscape improvements; and, the redevelopment of the Industrial Supply site will be key to the vibrancy of downtown. The Laurens County Trails Association, a volunteer non-profit organization, is working to extend the well-known Swamp Rabbit Trail (SRT) from Greenville County through Laurens County and specifically through downtown Clinton. The planned trail will go through the Industrial Supply site and provide an off-road alternative for transportation and will hopefully drive economic improvements as seen in smaller towns, such as Traveler's Rest. Developers have also indicated an interest in creating affordable housing in the target area due to the availability of tax credit programs.

The brownfields assessment project will incorporate equitable development, sustainable practices, and environmental justice approaches throughout the project activities. The City will support the existing mill village neighborhoods and promote equitable, affordable housing in the adaptive reuse of historic buildings and the stabilization of residential property values. The City will work with potential private investors to ensure environmentally sensitive brownfields cleanup and redevelopment that is consistent with community-identified priorities and prevent contaminant exposure. The project will increase the economic competitiveness of the target community by replacing blighted and underutilized properties with active businesses and community services for all residents. Members of the Brownfields Task Force will be representative of the targeted community, regardless of race, color, national origin, or income; and, therefore, all residents will have equal access to the decision-making process for the assessment and redevelopment of sites under the program. Overall, the assessment project will remove blighted and nuisance properties within the target community and encourage reuse that provides affordable housing, commercial services in a walkable neighborhood, new jobs, and economic growth for all residents.

#### **ii. Redevelopment Strategy**

The project will focus on the redevelopment of sites for economic development, downtown revitalization, affordable housing opportunities, and the extension of the SRT through downtown Clinton. As part of its continued community development efforts, the City envisions the redevelopment of the old mill sites for quality affordable housing that will strengthen the revitalization of the surrounding neighborhoods. Clinton Mill offers an excellent opportunity for adaptive reuse of some of the existing structures and infrastructure. The City is involved in community development activity in the Lydia mill village and will work closely with Laurens County to facilitate the redevelopment of the old Lydia mill site for quality affordable housing that will strengthen the existing neighborhood. Plus, a builder of single and multi-family housing in Clinton has expressed a specific interest in the former shirt factory site at 206 Davidson Street. Letter of support is attached.

The City received a grant to create a master plan for the redevelopment of the Industrial Supply site. In general, the vision is to rehabilitate the old warehouse buildings, reconstruct a version of the 1850s train depot as a welcome center and open-air market, and provide amenities such as greenspace, an extension of the SWT and an interactive water feature. The plan is nearing completion and will be provided for public comment in December. Most of the property will be slated for commercial use and small industries in order to create full time jobs, such as the 14 fulltime jobs Zaxby's created or the 17 jobs a recent industrial company considering the area proposed. Commercial facilities opening in the Industrial Supply redevelopment will be adjacent to the SRT, providing opportunities to walk or bike to work or shop instead of driving. The City and the current owners of the properties will use the master plan to market the redevelopment concept to potential private investors, but the environmental concerns about the site need to first be answered.

The assessments and cleanup planning will pave the way for new business growth, promote downtown revitalization, and create affordable housing opportunities that enhance the quality of life for all residents. Plus, the redevelopment of brownfield sites promotes the reuse of existing infrastructure, such as roads, rail, water, sewer, and utilities.

### **iii. Timing and Implementation**

The project will be managed by Mr. Jerre Threatt, Assistant City Manager. He will be responsible for leading each of the tasks and the overall grant administration to complete the project within three years, if not earlier. Upon grant award, he will establish a project team, comprised of City staff, SCDHEC and EPA representatives, and an environmental consultant to complete project activities under the guidance of the Brownfields Task Force.

**a. Contractor Procurement:** The City already has procured a consultant through a competitive, public procurement process in accordance with the federal (2 C.F.R. 200 and EPA's rule at 2 C.F.R. 1500) and local requirements. The City entered into a master services agreement with the top-ranked firm. Upon grant award, the City will negotiate a task order with the firm to have the project team in place and ready to begin work no later than October 1, 2018.

**b. Site Inventory and Prioritization:** Prior to submittal of this application, the City worked with the local community to develop the initial list and determine the high-priority sites. Upon award, this community engagement will be formalized through the creation of a Brownfields Task Force comprised of a diverse representation of the community to continue to build the site inventory, help set priorities, assist with site access and convey information to the community. The Task Force will be established no later than October 2018. The preliminary inventory of brownfield sites identified in Section 1.a.iii was based on community concern, immediate environmental hazards, and high potential for redevelopment. Once funds are awarded, the project team will work with the community and Brownfields Task Force to confirm prioritization for assessment activities based on the following criteria: 1) Level of perceived contamination and threat to human health and environment; 2) Alignment with local revitalization efforts; 3) Potential for redevelopment, job creation and alleviation of blight; and 4) Level of community support. Other criteria and specific weighting will be determined by the Task Force.

**c. Site Access:** The Project Manager, Mr. Threatt, will lead efforts to contact and educate property owners on the benefits of the program and to gain site access for assessments. He has already begun these efforts. The City has obtained access approval to perform environmental assessments on the Industrial Supply site from Chip Cooper, the current owner of the property. Mr. Cooper has agreed to serve on the BF Task Force and will be a great asset in talking to property owners to encourage them to provide access to their sites. A letter is attached. In addition, the City has entered into a Memorandum of Agreement (MOA) (attached) with the owner of the 207 Pitts St site and will be able to provide access through this MOA. A letter from the City is attached. Further, the City has had conversations with the owners of the Clinton and Lydia Mills, who both indicated that they would be interested utilizing the Brownfields Program for environmental assessment of their properties if there was a prospective purchaser or developer. As additional sites are identified and recommended for assessment by the Brownfields Task Force (regular agenda item for quarterly meetings), Mr. Threatt will continue to contact and

work with property owners to secure site access. The City will pursue legal options for securing access to abandoned sites, where an owner cannot be located or identified.

**b. Task Descriptions and Budget Table**

**i. Task Descriptions**

The City of Clinton is seeking funding in the amount of \$200,000 for properties with potential hazardous substance contamination and \$100,000 for properties with potential petroleum contamination. Funding will be used for the following Tasks: 1) community outreach; 2) site assessments; 3) cleanup/redevelopment planning; and 4) programmatic management. The following cost estimates are based on discussions with consulting firms specializing in brownfield assessment and redevelopment.

*Task 1 - Community Outreach:* City of Clinton will invite representatives of active community organizations and interested community members to serve on a Brownfields Task Force to guide the assessment grant project. The Task Force will hold regular community meetings to gather input, host educational seminars and workshops and provide project updates through a variety of sources, such as the City's website, local churches and the local media.

**Task 1 Cost Estimates**

Activity	Description	Amount (Hazardous)	Amount (Petroleum)
Travel	Conferences/workshops during project (e.g. National EPA Brownfields Conference, Regional Grantees Workshop)*	\$6,000	\$2,000
Supplies	Community presentation materials—posters, displays, maps	\$1,000	\$1,000
Contractual	Community Involvement Plan, information repository, marketing materials, public meetings**	\$20,000	\$10,000
<b>Total</b>		<b>\$27,000</b>	<b>\$13,000</b>

\*Includes: \$4,000 for 2 to attend National BF Conference; \$2,500 to attend SE BF Conference; and \$1,500 is for a second National or Regional Brownfields conference or other applicable seminars.  
\*\*Includes: \$3,750 for design/printing of marketing materials; \$26,250 for consultant to prepare for, attend and facilitate meetings with Task Force (12), residents (6), property owners (8), prospective purchasers (6) and public (3) (35 meetings @ \$750/meeting).

Expected outputs include: Attendance by City staff at least 2 workshops/conferences; community involvement plan; information repository; project webpage with updates; brochure; information sheets: articles for publication; 12 brownfields task force meetings; 6 public meetings; and 2 meetings with property owners (2).

*Task 2 – Site Assessments:* The project team will confirm the brownfields inventory and prioritize properties as indicated in Section 1.a.ii and conduct ESAs on priority sites. Phase I and II Eligibility Forms will be completed for EPA approval, and Petroleum determinations will be obtained from SCDHEC. Phase I ESAs conducted under this project will be performed by qualified contractors and in accordance with American Society for Testing and Materials (ASTM) Standard E1527-13 and the EPA All Appropriate Inquiry (AAI) Final Rule. Phase II ESAs will be conducted by qualified contractors in accordance with ASTM E1903-11. The following cost estimates are based upon the typical costs incurred for assessments as researched by consultants specializing in brownfield projects. In addition to completing Phase I and II ESAs, consultants will complete one generic Quality Assurance Project Plan (QAPP) and site-specific QAPPs and Health & Safety Plans (HSPs) for each site prior to initiating fieldwork. Expected outputs include Phase I ESAs (9), Asbestos surveys (4), Phase II ESAs (6), Generic QAPP (1), Site-specific QAPP (6), and HSPs (6).

**Task 2 Cost Estimates**

Activity	Hazardous			Petroleum		
	Quantity	Unit Cost	Total Cost	Quantity	Unit Cost	Total Cost
Phase I ESAs	6	3,000	18,000	3	2,500	7,500
Asbestos Survey	3	2,500	7,500	n/a	n/a	n/a
Generic QAPP	0.5	3,000	1,500	0.5	3,000	1,500
SSQAPP	4	3,500	14,000	2	3,500	7,000

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Phase II ESAs on Mill sites*	2	32,000	64,000	2	12,000	24,000
Other Haz Phase II ESAs	2	22,000	44,000	n/a	n/a	n/a
Petroleum Phase II ESAs	n/a	n/a	n/a	2	16,500	33,000
<b>Total Costs</b>			<b>\$149,000</b>			<b>\$73,000</b>
* Mill sites anticipated to have distinct petroleum areas of concern and will be split-funded.						

**Task 3 - Cleanup and Redevelopment Planning:** Subsequent to assessment activities, remediation and cleanup plans will be developed for high priority sites. The Analysis of Brownfield Cleanup Alternatives (ABCA) will identify potentially applicable remediation alternatives and estimate the nature, extent, duration, and cost of implementing site remediation activities. Sites selected for redevelopment will be based on reuse alternatives identified through community outreach activities. The project team will compare the potential land uses with the environmental impacts associated with the properties and the steps required to redevelop the property. The level of remedial action can then determine how to best meet the needs of the community. Activities in Task 3 will be conducted by qualified contractors. Expected outputs include ABCAs (4) and cleanup redevelopment plans (3).

**Task 3 Cost Estimates**

Activity	Hazardous			Petroleum		
	Quantity	Unit Cost	Total	Quantity	Unit Cost	Total
ABCAs	2	5,000	10,000	2	3,500	7,000
Cleanup Redevelopment Plans	2	4,000	8,000	1	4,000	4,000
<b>Total</b>			<b>\$18,000</b>			<b>\$11,000</b>

**Task 4. Project Management and Reporting:** The City will directly oversee grant implementation and administration and, as necessary and in support of its activities, but will secure contractual support to ensure effective and efficient project management and compliance with EPA cooperative agreement terms & conditions. With contractor assistance the City will complete EPA quarterly reports, MBE/WBE forms, & EPA ACRES database and other programmatic support with contractor assistance while providing oversight and review of the programmatic grant elements. \$9,000 is budgeted for contractual program support (\$6,000 hazardous substances and \$3,000 petroleum).

**Task 4 Cost Estimates**

Activity	Description	Amount (Hazardous)	Amount (Petroleum)
Project Management and Reporting	Programmatic support, including EPA quarterly reports, MBE/WBE forms, & EPA ACRES database updates	\$6,000	\$3,000
<b>Total</b>		<b>\$6,000</b>	<b>\$3,000</b>

**ii. Budget Table**

Budget Categories	Task 1	Task 2	Task 3	Task 4	Total Haz	Task 1	Task 2	Task 3	Task 4	Total Petro
Personnel	0	0	0	0	0	0	0	0	0	0
Fringe	0	0	0	0	0	0	0	0	0	0
Travel	6,000	0	0	0	6,000	2,000	0	0	0	2,000
Equipment	0	0	0	0	0	0	0	0	0	0
Supplies	1,000	0	0	0	1,000	1,000	0	0	0	1,000
Contractual	20,000	149,000	18,000	6,000	193,000	10,000	73,000	11,000	3,000	97,000
Other	0	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>\$27,000</b>	<b>\$149,000</b>	<b>\$18,000</b>	<b>\$6,000</b>	<b>\$200,000</b>	<b>\$13,000</b>	<b>\$73,000</b>	<b>\$11,000</b>	<b>\$3,000</b>	<b>\$100,000</b>

**c. Ability to Leverage**

The ability to leverage both public and private funds through the brownfields project is substantial. The City already has firm committed leveraging as outlined in the following table.

**Confirmed Leveraging Resources**

Funding Source	Use of Funds	Amount	Status
SC Municipal Association	Master Plan for the Industrial Supply brownfield site	\$25,000	Secured

Funding Source	Use of Funds	Amount	Status
City of Clinton	Match for Master Plan for the Industrial Supply brownfield site	\$2,500	Secured
	Personnel Time for Project Management	\$20,000	Secured
	Accommodations Tax, economic development funds, private funds for Welcome Center near Industrial Supply site	\$400,000	Secured
Palmetto Pride	Site improvements such as benches for Industrial Supply redevelopment	\$10,000	Secured
Laurens County Trails Assoc	Non-profit fundraising to extend SRT through Clinton	TBD	Potential
Private Developer	Housing on 205 Davidson Street (shirt factory), if env. issues are defined	TBD	Potential

The City, along with the Clinton Economic Development Corporation (CEDC), will seek private investors in which to partner in order to leverage investment for redevelopment of the brownfields sites. See attached letter from CEDC. The City will encourage private non-responsible parties who are interested in redeveloping brownfields to access the State's Voluntary Cleanup Contract and SCDHEC's EPA Brownfields Cleanup Revolving Loan Fund programs, as well as state and federal tax credits that are available. The entire City of Clinton is located within qualifying census tracts for New Markets Tax Credits (NMTC) and Low-Income Housing Tax Credits (LIHTC).<sup>15</sup> Both of these programs have substantial opportunity for leveraging. Nationally, between 2003 and 2014, \$38 billion in NMTC investments leveraged nearly \$75 billion in total capital investment to businesses and revitalization projects in communities with high rates of poverty and unemployment. Between 2003 and 2012, the NMTC generated about 750,000 jobs.<sup>16</sup> Other effective leveraging may include Historic Tax Credits and SC Textile Revitalization Tax Credits (for reuse of old mill structures), as well as state corporate income tax credits for expenses incurred for cleaning up a site, jobs tax credits, and fees in lieu of property taxes with a \$1 million threshold minimum.

### **3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS**

#### **a. Engaging the Community**

##### **i. Community Involvement Plan**

On November 1, the City issued a Press Release that notified the community of an announcement of the EPA Brownfields Assessment Grant application at the Arbor Day Celebration on November 3<sup>rd</sup> at the Park by Clinton Mills. This celebration which included the planting of five trees attracted 40 people, many of whom were residents of the Clinton mill village. Several people offered their support of the grant with one commenting, "you don't have to look far to find one of those brownfields". Both *The Clinton Chronicle* and *The Laurens County Advertiser* covered the event and wrote stories about the application and how it could help the City with redevelopment of old abandoned sites. A local radio station, WLBG, announced that Clinton was applying for an EPA Brownfields Grant and included information on its website. A number of other community organizations and churches were contacted to announce and solicit support for the grant application including: The United Way of Laurens County, Friendship AME Church, Calvary Baptist Church, The United Ministries, The Open Door, Laurens County, The Good Shepherd Free Medical Clinic, and the Laurens County Memorial Hospital. The City will continue to build upon this successful community outreach.

Upon grant award, a Community Involvement Plan (CIP) will be developed with community input and will guide the public engagement activities of the assessment grant project. As part of this process, the City will establish a Brownfields Task Force of community organization representatives (described in Section 3c). The Task Force will meet once a quarter and provide the following functions: 1) guide site selection activities under the assessment grant based on criteria discussed in 2.a.ii; 2) ensure the project aligns with community interests and needs; 3) promote the benefits of the project to property owners and developers; 4) communicate project updates to the community; and 5) raise community concerns and needs to the project team. The project team also will meet with and engage neighborhoods, local church groups and other community groups. Public meetings will be held twice a year (a total of six) to present project

<sup>15</sup> US Department of Housing, 2016 and 2017 Small DDAs and QCTs, [https://www.huduser.gov/portal/sadda/sadda\\_qct.html](https://www.huduser.gov/portal/sadda/sadda_qct.html), November 2017

<sup>16</sup> New Markets Tax Credit Coalition, <http://nmtccoalition.org/fact-sheet/>,

updates, solicit feedback, and invite community participation. The project team will prepare outreach and promotional materials to be distributed at meetings, as well as via mail, newspapers, and the City's website. Public meetings and other significant events will be advertised in the local newspaper, *The Clinton Chronicle*. In the redevelopment planning stages of specific properties, the project team and Brownfields Task Force will conduct workshops and/or visioning sessions to fully engage the community in the cleanup and redevelopment planning process. The project team and partners will work closely with the community and potential developers to ensure the sustainable redevelopment of the brownfield sites.

## **ii. Communicating Progress**

The project team will work with its partners and Brownfields Task Force to keep the community updated on the progress of the project, using a variety of communication methods to ensure all of the different social, economic, educational levels and age groups within the targeted area are reached. This includes low-tech methods such as newspaper press releases, local radio announcements, brochures/flyers, church bulletins, and presentations at local groups to reach out to lower income individuals that may not have easy access to the Internet. The City has an active online presence that includes a website, Facebook, Twitter, and Instagram, and offer the ability for residents to ask questions or report issues both on the City's website and using an app for mobile devices. Marketing materials will be distributed through local businesses, non-profits, and churches. Update meetings will be held within the community using local churches and community centers to make it easier for residents to attend, particularly those with limited transportation options. The majority of Clinton's population speaks English, but bi-lingual employees (in the City's customer service and public safety departments) are available to translate for residents as needed.

## **b. Partnerships with Government Agencies**

### **i. Local/State/Tribal Environmental Authority**

The South Carolina Department of Health and Environmental Control (SCDHEC) is the agency responsible for the State brownfields and voluntary cleanup programs. SCDHEC will assist with site eligibility determinations; the technical review of assessments, site-specific work plans, cleanup plans (ABCAs), and development of brownfields Voluntary Cleanup Contract (VCC) agreements. A SCDHEC letter from the Land and Waste Management Bureau, which includes the Brownfields Program, is attached.

### **ii. Other Governmental Partnerships**

As the funding agency, the Environmental Protection Agency (EPA) will have significant involvement in the project. The City will work with **EPA Region 4's** Project Officer to ensure all work is completed in accordance with the terms and conditions of the grant and that the Work Plan is met in a timely manner. The **SCDHEC Upstate Public Health Regional Office** has also provided a letter of support for the grant application. The organization will provide core statistics and other relevant data as needed and support the efforts of the Brownfields Task Force in implementing the grant program. Letter is attached. **Laurens County** supports the grant application, specifically with regard to the assessment of the Lydia Mill site located in the County adjacent to the City and for which taxes have not been paid for several years, yet the Forfeited Land Commission will not accept. The **Clinton Economic Development Corporation** will partner with the City to facilitate the redevelopment of brownfield sites to increase the City's economic opportunities and create jobs. A letter of support is attached. The **Municipal Association of South Carolina** is partnering with the City by providing a Hometown Economic Development Grant for creation of master plan and revitalization strategy for Industrial Supply Company warehouse complex, one of our high-priority brownfield sites.

## **c. Partnerships with Community Organizations**

### **i. Community Organization Description & Role**

The following Community Organizations and individuals have provided commitment letters.

<b>Community Organization</b>	<b>Description</b>	<b>Project Role</b>
Chip Cooper	Owner of Industrial Supply Property	Provide site access; Serve on BF Task Force
Laurens County Chamber of	Organization of business community to promote the civic	Brownfields Task Force

Community Organization	Description	Project Role
Commerce	and economic progress	
Bailey Foundation	Local charitable organization that supports revitalization efforts in Clinton	Brownfields Task Force
Reverend Steven Evans, Friendship AME Church	House of Worship near Lydia Mill Reverend makes a firm commitment to support project 2-3 hrs/month at \$75/hr	Serve on BF Task Force; make announcements to the congregation; members will assist with site access
Jeff DeWitt	Volunteer Chairman of Clinton's Planning Commission; geologist who has brownfields experience; lives across the street from the old shirt factory	Serve on BF Task Force
Jeannie Browning	Wife of Pastor Calvary Baptist Church in Clinton Mill neighborhood, volunteers in neighborhood	Serve on BF Task Force; Use of Church for meetings
United Ministries	Non-profit providing food and funding for utility bills to those in need	Provide location for meetings

#### **d. Partnerships with Workforce Development Programs**

The City of Clinton does not currently have an EPA Brownfields Job Training program, nor is there one in the immediate area. However, Rusty Denning, VP at Piedmont Technical College states that they regularly offer HAZWOPER training and offer asbestos survey, inspector, and abatement training, when there is a need. The City will connect potential employers with the school to assist with their staffing needs. In addition, the City's consultant is committed to offering subcontracting opportunities to and/or procurement of product/services from local firms and individuals, when feasible.

### **4. PROJECT BENEFITS**

#### **a. Welfare, Environmental, and Public Health Benefits**

*Welfare Benefits:* Conducting assessments on brownfields will remove a major barrier to redevelopment by either eliminating the concerns of potential environment issues or by taking the first step in eliminating any actual exposure to harmful contaminants. Ultimately, this will facilitate the cleanup and redevelopment of substantially blighted and unsafe properties, eliminating issues such as dangerous debris on the Lydia Mill site and fire hazards on the Clinton Mill site. If the community is successful in achieving its vision, both of these sites will be redeveloped for quality affordable housing that supports the revitalization of the surrounding neighborhoods. Other brownfield sites will be reinvigorated as locations for active businesses, providing goods, services and jobs within walking distances of the neighborhoods. The open air market planned as part of the redevelopment of the Industrial Supply site, located only a 10-minute walk from the Clinton Mill neighborhood, will bring much needed healthy food options to the targeted population.

*Environmental Benefits:* Many areas of Clinton, particularly those that include the Lydia and Clinton mill neighborhoods, are overburdened by multiple sources of pollution; EPA rates these areas in the top 50-90 percentile in the nation for a variety of environmental justice issues.<sup>17</sup> Additional burdens are placed on Clinton's large African-American population (39% of total population) and those economically disadvantaged families (47% of families) that live in close proximity to brownfields sites, such as in the Lydia and Clinton mill neighborhoods, where other environmental concerns include potential contaminants from former underground storage tanks, asbestos, solvents, pesticides, herbicides, and other industrial uses. Assessing these sites will determine if impact has occurred to the environment, and if so, at what levels and to what extent. Cleaning up and redevelopment of brownfield properties will have the direct environmental benefit of eliminating or limiting site contaminants and release of air pollutants, as well as relieving undue burden on the targeted population. Additionally, the redevelopment of abandon and underutilized properties will support the revitalization of the neighborhoods, downtown and commercial corridors, strengthening the tax base and municipal revenues. These revenues may be used to help the City update much needed sewer improvements.

*Public Health Benefits:* The extent of the impact on public health that potential hazardous

<sup>17</sup> EPA Environmental Justice Online Tool, <https://www.epa.gov/ejscreen>

substances and petroleum contamination associated with the brownfield sites is currently unknown. Conducting environmental assessments will allow the City to determine the extent and nature of contamination at these sites and take appropriate actions to mitigate any risks. The historical uses of the old mills, in both the Clinton and Lydia mill neighborhoods, as well as the Industrial Supply site and other brownfields, raise concerns about potential exposure of residents to contaminants. This includes: Direct contact of potential hazardous materials to residents and vagrants illegally accessing the uncontained sites; Potential air pollutants from demolition activities, fires, and current uses; and Stormwater runoff containing potential contaminants from the sites, particularly in areas like Lydia, where flooding is known to occur.

EPA rates the neighborhoods in Clinton in the top 70-90 national percentile on the Environmental Justice (EJ) Index for cancer risk and respiratory illnesses.<sup>18</sup> The eventual mitigation and redevelopment of properties such as the Clinton Mill, Lydia Mill and Industrial Supply sites will reduce the health risks to residents and the community's risk of chronic illnesses such as cancer and asthma, particularly those minority and poor populations in Clinton currently overburdened by EJ issues. Additionally, this grant may assist in the redevelopment of properties that include green space, walking trails, and food market activities within walking distance of residents' homes, as in plans for the Industry Supply site, potentially reducing the obesity rate and other related illnesses associated with lack of healthy food and exercise.

#### **b. Economic and Community Benefits**

The City of Clinton's 2015 Economic Development Strategic Plan focuses strongly on the redevelopment of under-utilized and vacant properties, the continued support of downtown revitalization, and the use of the City's industrial/corporate park to attract new business and quality jobs. Addressing the community's brownfield sites will allow Clinton, and the targeted population, to benefit from the economic growth that is being experienced in other areas of the region. Specifically, the assessment grant will address costs that often make brownfield redevelopment financially difficult, address environmental liabilities, and facilitate private redevelopment for positive local business activities, new affordable quality housing, and public spaces. This will stabilize downtown, encourage reinvestment in existing neighborhoods, strengthen real property values, and provide additional revenues to the City to fund critical public infrastructure and services. The redevelopment of the two mills sites alone, including the adaptive reuse of the old Clinton Mill structure, could provide an estimated 400 new housing units, a mix of multi-family and single-family, to the Lydia and Clinton mill neighborhoods. With a median price point of \$100,000, this would directly add a potential \$40 million in real estate value to the tax rolls. This would generate an estimated additional \$1.24 million in annual tax and utility revenues for the City.<sup>19</sup> The indirect cumulative impact would be even greater with these redevelopments serving as revitalization catalysts for the surrounding neighborhoods. Studies show that residential property values increase by 5–15.2% percent once a nearby brownfield is assessed or cleaned up.<sup>20</sup>

Clinton's brownfields are a significant impediment to attracting new industries with quality jobs. Economic development recruitment is often stalled when potential investors visit the community and do not find the strong quality-of-life environment they seek. The per capita income in Clinton is approximately \$15,000, while the per capita income the Upstate region as a whole is \$24,122.<sup>21</sup> Ultimately, the assessment, cleanup and redevelopment of brownfields will lead to a more vibrant community that will attract the major employers providing the higher paying jobs more in line with those in other parts of the region.

### **5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Audit Findings:** The City of Clinton's most recent audit was completed on November 14, 2017 for fiscal year ending June 30, 2017, and was conducted by McKinley, Cooper and Co., LLC. The City has not received any adverse audit findings relative to the administration of any

<sup>18</sup> EPA Environmental Justice Online Tool, <https://www.epa.gov/ejscreen>

<sup>19</sup> Based on "Monthly Impact of Tax and Utility Rates on Typical Residential Household," provided in City of Clinton Annual Budget Fiscal Year 2016-2017, Clinton, SC, <http://www.cityofclintonsc.com>

<sup>20</sup> EPA, <https://www.epa.gov/brownfields/brownfields-program-accomplishments-and-benefits>, November 2017

<sup>21</sup> ESRI Business Analyst 2016 cited by Upstate Alliance, <http://www.upstatealliance.com/about-upstate/regional-fact-sheets>

grants.

**b. Programmatic Capability:** The brownfields assessment grant project will be managed by Jerre Threatt. Mr. Threatt is the Assistant Manager of the City of Clinton and oversees all local economic and community development, planning, and development projects. Mr. Threatt has a master's degree in Historic Preservation from Savannah College of Art and Design with a focus on adaptive reuse and downtown revitalization. He also holds a Certificate in Public Administration from Clemson University and has successfully completed Preservation Leadership Training through the National Trust for Historic Preservation. Mr. Threatt has experience administering grants from the National Park Service, Department of Archives and History, Richland County Conservation Commission, and the National Trust for Historic Preservation. Mary-Wallace Riley, Special Projects Coordinator for the City will assist Mr. Threatt in the management of the project. Mrs. Riley has a degree in political science and sociology from Presbyterian College and over 8 years of experience managing grants and projects for the City.

The City hired a consultant experienced in brownfields assessment and redevelopment to complete the technical aspects of the project. The City already has selected the consultant through a competitive, public procurement process in accordance with local and federal requirements, and will follow similar procedures to procure additional resources or contractor services if needed.

**c. Measuring Environmental Results:** The project team and Brownfields Task Force will meet quarterly to track the project's progress in fulfilling the scope of work, goals, and objectives. Each Quarterly Report will also include an update of project expenditures and track activities and expenses against the project's schedule. Corrective action and work plan modification requests will be identified as appropriate. Specific performance metrics detailed in the Work Plan will be used to summarize project accomplishments. The project team will also invite the EPA Project Officer to participate in the quarterly meetings via conference call to review progress and address any issues. Additionally, site-specific information will be routinely entered and tracked in the online Assessment Cleanup and Redevelopment Exchange System (ACRES) database. At a minimum, the outputs to be tracked include the number of task force meetings, public meetings, meetings with community groups, environmental assessments, ABCAs, and cleanup redevelopment plans; and, the outcomes to be tracked include community participation, acres assessed, acres ready for reuse, redevelopment dollars leveraged, and jobs created.

**d. Past Performance and Accomplishments:** The City of Clinton has never received an EPA Brownfields Grant, but has a history of managing federal and state funds. The following table outlines examples. The City has complied, or is in compliance, with all work plans, schedules and grant terms and conditions. No corrective actions have been required. Reporting has been timely and acceptable to the granting organization.

**Summary of Relevant Recently Funded Grants to the City of Clinton**

Organization	Amount	Purpose & Accomplishments	Compliance & Progress
Santee Cooper - Economic Development Grant	\$870,000	Construction of 100,000 sf industrial pad; Grading and preparation of 5-acre site for future retail development.	Industrial pad completed; retail site grading completed. Compliance reports have been submitted.
Rural Infrastructure Authority	\$300,000	Sewer infrastructure for City's 10-acre industrial site (Economic Development)	Will be completed and reports finished in early 2018.
SC Dept of Commerce (CDBG)	\$100,000	Stabilization of downtown historic building	New Award – Will be completed and reports finished in 2018
SC Dept of Parks, Recreation & Tourism	\$99,000	Recreational Trails Program for creating Millers Fork Trail in Clinton.	Currently in process with construction to be finished in early 2018. Quarterly reports submitted on time.
Municipal Association of SC	\$25,000	Hometown Economic Development Grant for creation of master plan/revitalization strategy for Industrial Supply Company warehouse complex.	Architectural firm has been working on master plan. Currently gathering citizen input and making revisions in order to finalize by early 2018.

**THRESHOLD CRITERIA for ASSESSMENT GRANTS**

**1. Applicant Eligibility**

The City of Clinton, South Carolina, is a general-purpose unit of local government as defined under 2 CFR 200.64.

**2. Community Involvement**

A Community Involvement Plan (CIP) will be developed with community input and will guide the public engagement activities of the assessment grant project. As part of this process, the City will establish a Brownfields Task Force of community organization representatives. The Task Force will meet once a quarter and provide the following functions: 1) guide site selection activities under the assessment grant 2) ensure the project aligns with community interests and needs; 3) promote the benefits of the project to property owners and developers; 4) communicate project updates to the community; and 5) raise community concerns and needs to the project team. The project team also will meet with and engage neighborhoods, local church groups and other community groups on a regular basis. Public meetings will be held twice a year (a total of six) to present project updates, solicit feedback, and invite community participation. The project team will prepare outreach and promotional materials to be distributed at meetings, as well as via mail, newspapers, and the City's website. Public meetings and other significant events will be advertised in the local newspaper, *The Clinton Chronicle*. In the redevelopment planning stages of specific properties, the project team and Brownfields Task Force will conduct workshops and/or visioning sessions to fully engage the community in the cleanup and redevelopment planning process. The project team and partners will work closely with the community and potential developers to ensure the sustainable redevelopment of the brownfield sites.

# Application for Federal Assistance SF-424

## \* 1. Type of Submission:

- ☒ Preapplication  
☐ Application  
☐ Changed/Corrected Application

## \* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

## \* 3. Date Received:

11/15/2017

## 4. Applicant Identifier:

## 5a. Federal Entity Identifier:

## 5b. Federal Award Identifier:

## State Use Only:

## 6. Date Received by State:

## 7. State Application Identifier:

## 8. APPLICANT INFORMATION:

### \* a. Legal Name:

City of Clinton, South Carolina

### \* b. Employer/Taxpayer Identification Number (EIN/TIN):

57-6001015

### \* c. Organizational DUNS:

0301054310000

## d. Address:

### \* Street1:

211 North Broad Street, Suite A

### Street2:

### \* City:

Clinton

### County/Parish:

### \* State:

SC: South Carolina

### Province:

### \* Country:

USA: UNITED STATES

### \* Zip / Postal Code:

293250748

## e. Organizational Unit:

### Department Name:

### Division Name:

## f. Name and contact information of person to be contacted on matters involving this application:

### Prefix:

Mr.

### \* First Name:

Jerre

### Middle Name:

### \* Last Name:

Threatt

### Suffix:

### Title:

Assistant City Manager

## Organizational Affiliation:

### \* Telephone Number:

(864) 833-7508

### Fax Number:

(864) 833-7533

### \* Email:

jthreatt@cityofclintonsc.com

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

### Type of Applicant 2: Select Applicant Type:

### Type of Applicant 3: Select Applicant Type:

### \* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

### CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-17-07

### \* Title:

FY18 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

### 13. Competition Identification Number:

### Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Community-wide Brownfields Assessment Project

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**\* a. Applicant \* b. Program/Project 

Attach an additional list of Program/Project Congressional Districts if needed.

**Add Attachment****Delete Attachment****View Attachment****17. Proposed Project:**\* a. Start Date: \* b. End Date: **18. Estimated Funding (\$):**

* a. Federal	<input type="text" value="300,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="300,000.00"/>

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

**Add Attachment****Delete Attachment****View Attachment**

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

\* Title: \* Telephone Number:  Fax Number: \* Email: \* Signature of Authorized Representative:  \* Date Signed:





R04-18-A-077

Office of the Mayor

November 10, 2017

Ms. Barbara Alfano, Brownfields Coordinator  
Environmental Protection Agency Region 4  
Atlanta Federal Center  
61 Forsyth Street, S.W., 10th Floor  
Atlanta, GA 30303-8960

Re: City of Greenville, South Carolina  
FY 2018 EPA Brownfields Community-Wide Assessment Grant Proposal

Dear Ms. Alfano:

The City of Greenville is pleased to submit an application for consideration for a FY2018 Environmental Protection Agency (EPA) Community-Wide Assessment Grant. Funds from this grant program will be used to assess properties potentially contaminated by hazardous substances and petroleum throughout the City's Reedy River Redevelopment Area (RRRA)—a roughly 350-acre planning area that encompasses much of the City's west side. After decades of idling amongst abandoned and rundown manufacturing buildings, textile facilities, and old service stations, the RRRA is slowly entering an era of revitalization. As development emanating from Greenville's downtown pushes westward and the City completes major projects to encourage the area's renaissance—like the recent relocation of its Public Works Operations Center to free the property for a regional park—the need to protect and promote equitable development for the area's low-income residents becomes increasingly pressing. To that end, this grant project, which will strive to incorporate authentic community engagement while clearing some of the RRRA's properties for equitable uses such as park land or future affordable and workforce housing developments, is critical.

The following information is provided per the guidelines.

**a. Applicant Identification:** City of Greenville, South Carolina  
206 South Main Street  
Greenville, SC 29601-2832

**b. Funding Requested:**

- i). Grant type:** Assessment
- ii). Assessment Grant Type:** Community-wide
- iii). Federal Funds Requested:** \$300,000. A waiver request is not applicable.
- iv). Contamination:** \$200,000 for hazardous substances; \$100,000 for petroleum



Office of the Mayor

**c. Location:** City of Greenville, Greenville County, South Carolina

**d.** Not applicable

**e. Contacts:**

**i). Project Director:**

Monique Mattison, Community Planner

Phone: 864-467-4574

Email: mmattison@greenvillesc.gov

Mailing Address: City of Greenville

P.O. Box 2207

Greenville, SC 29602

**ii). Chief Executive/Highest Ranking Official:**

Honorable Knox H. White, Mayor

Phone: 864-467-4590

Email: kwhite@greenvillesc.gov

Mailing Address: City of Greenville

P.O. Box 2207

Greenville, SC 29602

**f. Population:**

**i).** City of Greenville – 61,734 (2011-2015 American Community Survey data)

**ii).** Not applicable

**iii).** No, the City of Greenville is not located within a county (nor does the City's jurisdiction include a county) experiencing "persistent poverty" where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.

**g. Regional Priorities Form/Other Factors Checklist:** Attached

**h. Letter from the State Environmental Authority:**

A letter from Ms. Daphne Neel, Chief for the South Carolina Department of Health and Environmental Control's Bureau of Land and Waste Management, acknowledging the State's awareness and support of the City's grant application is attached.

Thank you for your time and consideration. If you have any questions, please feel free to contact me at (864) 467-4590.

Sincerely,

Knox H. White  
Mayor

### Appendix 3 - Regional Priorities Form/Other Factors Checklist

Name of Applicant: City of Greenville, South Carolina

#### Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s):

Region 4: Assistance to Communities That Have Limited In-House Capacity to Manage

Brownfield Projects

Page Number(s): 5

#### Assessment Other Factors Checklist

Please identify (with an **X**) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	1, 2
The jurisdiction is located within, or includes, a county experiencing "persistent poverty" where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	9
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	



November 10, 2017

Barbara Alfano  
Region 4 Brownfields Coordinator  
United States Environmental Protection Agency  
Resource Conservation and Restoration Division  
61 Forsyth Street SW  
Atlanta, Georgia 30303-8960

RE: EPA Brownfields Community-wide Assessment Grant  
City of Greenville, South Carolina

Dear Ms. Alfano:

The South Carolina Department of Health and Environmental Control, the State's environmental authority, acknowledges and fully supports the City of Greenville's Community-wide Brownfields Assessment Grant application with a focus on the West Side of Greenville including the West Greenville, West End and Southernside neighborhoods and the footprint of the new City Park.

We support the City's efforts to identify properties for cleanup and redevelopment to benefit the community. If the grant is awarded, the Department will provide technical assistance to the City as it works to cleanup and redevelop Brownfields sites in their community.

The Department appreciates your consideration of the application, and hopes for a favorable outcome. Your positive response will assist the City in ongoing efforts to revitalize several communities on Greenville's west side. These neighborhoods are the subject of a Partnership for Sustainable Communities grant project, called Connections for Sustainability. A successful Brownfields grant application would enable the City to continue the ongoing work to address blighted and vacant properties in these economically depressed neighborhoods. Please contact my staff with any questions; Robert Hodges is the manager of our Brownfields Program, and he can be reached at (803) 898-0919.

Sincerely,

A handwritten signature in black ink that reads 'Daphne Neel'. The signature is written in a cursive, flowing style.

Daphne Neel, Chief  
Bureau of Land and Waste Management

cc: Natalie Kirkpatrick, Upstate EA Greenville  
Robert Hodges, Manager, Brownfields Program

## **Narrative Proposal/Ranking Criteria for Community-Wide Assessment Grants**

### **1. Community Need**

#### **1.a. Target Area and Brownfields**

**i) Community/Target Area Description:** Located in the northwestern corner of South Carolina, Greenville regularly earns top-billing as one of the nation's best places to live and do business mostly due to its flourishing downtown that hosts 3.5 million square feet of office space, a multitude of shops and restaurants, museums, and ample outdoor space. Slightly west of downtown is the West Side—an area that encompasses three minority and economically-disadvantaged neighborhoods and the majority of the city's brownfields—many of which are the hulking remains of old textile mills and facilities.

In 1920, 16 cotton mills and two dye and bleaching mills formed a semi-circle throughout Greenville's West Side. The industry weathered the Great Depression, experienced a resurgence after World War II, and, by 1960, had earned Greenville the title of "Textile Capital of the World." In addition to serving as the community's economic lifeblood, the textile industry and the mill villages that surrounded each facility created a lasting imprint on the city's layout. More than 2,000 homes housed the mills' workforce and many still stand in the neighborhoods that makeup the West Side today. Unfortunately, in the 1970s cheaper labor overseas, international trade agreements, and the failure to modernize, eroded the industry's market stronghold. As the mills closed, leaving vast facilities and environmental concerns in their wake, the West Side and the city suffered. Businesses were shuttered or razed, people left in droves in search of employment elsewhere, and the mills' workforce housing deteriorated.

In the late 1970s, a concentrated effort by community leaders to revitalize downtown forged separate futures for Greenville's urban core and the West Side. As a series of planning efforts and significant public and private reinvestment revitalized Greenville's Main Street, less than three miles away the West Side languished amongst its blighted textile facilities. Manufacturers of soft drinks and other consumables, as well as a plethora of auto repair shops and service stations sprang up in the West Side but were unable to fill the void from the textile industry's flight.

Thirty-seven years later, Greenville's vibrant downtown is booming, while the West Side is just beginning to experience the successes that initiated Main Street's revival. For example, catalytic developments atop former brownfields (and stimulated by previous EPA Brownfields Assessments), like the Salvation Army's Ray and Joan Kroc Community Center (Kroc Center)—a family support, education, recreation, and cultural arts facility—and A.J. Whittenberg (AJW) Elementary School are improving the quality of life for West Side residents while attracting new development. New community planning efforts also have been completed, including the identification and strategic planning of the Reedy River Redevelopment Area (RRRA), a roughly 350-acre planning area that envelopes much of the West Side and includes plans for a new regional City Park. Other galvanizing factors include downtown's skyrocketing growth, which is steadily advancing westward, and the permanent closure of the City's West Side-based Public Works Operations Center in December 2017 to make way for the City Park. Assessing brownfields throughout the RRRA, this project's target area, will considerably advance the area's current pace of redevelopment while ensuring new development is equitable for all residents.

**ii) Demographic Information/Indicators of Need:** Not surprisingly, given its nearly forty-year moribund status post textile industry flight, the RRRA's residents are facing a multitude of economic hardships. There are 4,576 people residents living in the RRRA, **making it a target**

**micro-community with a population of 10,000 or less.** More than 78% of residents are considered a minority (predominantly Black) and the average per capita income is \$13,263, more than \$17,700 below that of the city. These demographics, especially when combined with the area's brownfields, raise strong environmental justice concerns. Other sharp differences in economic prosperity between the RRRA and the rest of the city, shown in the table below, include: a poverty rate that is more than double that of the city; a high percentage of households receiving SNAP benefits (food assistance); a considerably higher unemployment rate; and a worrisome rate (51.9%) of families with children living in poverty. RRRA residents also are much less likely to own their homes, with an average 73% rental home rate contrasted to 57.6% in the city. RRRA home values also are alarmingly low—more than \$122,000 below that of the city.

Demographic	Reedy River Redevelopment Area			City of Greenville	South Carolina	National
	Census Tract 7	Census Tract 8	Census Tract 9			
Population	1,981	1,308	1,287	61,734	4,777,576	316,515,021
% Minority	75.8%	86.4%	73%	37.6%	36.1%	37.8%
% African-American	65.9%	81.0%	70.4%	28.8%	27.5%	12.6%
% Hispanic	5.8%	4.7%	2.8%	5.1%	5.3%	17.1%
% children (under 5)	3.7%	7.3%	6.4%	5.8%	6.1%	6.3%
% females of childbearing age (15-44 to align with ACS age ranges)	38.7%	41.9%	37.6%	46.4%	38.2%	39.3%
% elderly (65+)	14.2%	7.9%	9.6%	12.0%	15.2%	14.1%
Unemployment	12%	9.2%	13.1%	5.9%	5.7%	5.0%
Poverty Rate	45%	54.3%	47.8%	19.3%	17.9%	15.5%
% families w/children below poverty	53.8%	53.4%	48.5%	23.5%	22.0%	18.0%
Per Capita Income	\$14,053	\$8,876	\$16,861	\$31,015	\$24,604	\$28,930
Median Household Income	\$20,938	\$14,491	\$16,958	\$41,924	\$45,483	\$53,889
Median Home Value	\$83,700	\$57,500	\$155,600	\$221,800	\$139,900	\$178,600
% Rental Homes	66.7%	78.3%	74.0%	57.6%	31.4%	36.1%
% w/SNAP benefits in past 12 months	32.2%	41.9%	37.5%	13.8%	15.1%	13.2%

Sources: 2011-15 American Community Survey (ACS) 5-Year Estimates (factfinder.census.gov, accessed October 2017)

Other 2011-2015 ACS Estimates illustrate additional socioeconomic challenges in the RRRA. The RRRA population is aging—more than 14% of residents are between the ages of 55 and 64 and almost 30% are between the ages of 45 and 64. As these groups age in place, the RRRA's senior population (age 65+), and a population particularly sensitive to the presence of brownfields, will grow. Educational attainment is poor; 23.4% of the population entered grades 9<sup>th</sup> to 12<sup>th</sup> but received no diploma compared to 8.2% citywide. Assessing and redeveloping the area's brownfields will help: address real and perceived environmental issues (discussed in section 1.b.ii) which may negatively impact sensitive populations, like elderly and women of childbearing age; bring new businesses and services to the area thereby providing more job opportunities; and bring more schools to the area (like AJW Elementary).

**iii) Description of Brownfields:** The RRRA's brownfields range in size from small (<1 acre) to large (>20 acres) and include sites that were former gas/service stations, dry cleaners, railroad sites, and textile and textile support facilities. Many of these sites are abandoned and run-down which only intensifies negative perceptions about the area's environmental concerns. These sites are interspersed amongst the area's neighborhoods (as mentioned in section 1.a.i workforce housing for the textile mills, which is still in use today, typically flanked the facility) and

commercial corridors. Potential contamination ranges from lead and polychlorinated biphenyls (PCBs) connected to the area's textile past to complex mixtures of volatile organic compounds from gas stations that were deserted well before environmental best practices were standard. Moreover, reports from local environmental groups (including project partner Upstate Forever) claim during the textile industry's heyday, the Reedy River's waters ran the color of dye that was dumped into it daily. As such, past flooding events could have dispersed a number of adverse contaminants throughout the RRRA's neighborhoods. One site for which this is a chief concern is a 4.5-acre site situated in the river's floodway and south of a row of warehouses. This site is slated to become City Park's Great Lawn, an open gathering space that is expected to be well-used given its proximity to a planned visitor's center, playgrounds, and concert stage. Remediating perceived and actual environmental concerns on this site is a necessity before this gateway feature of City Park can be constructed.

### **1.b. Welfare, Environmental, and Public Health Impacts**

**i) Welfare Impacts:** Brownfields impacts on the RRRA community's welfare are pervasive. According to the United States Department of Agriculture's Food Access Research Atlas, all three of the RRRA's census tracts have low access to healthy and affordable food, and tracts 7 and 8 have extremely high percentages of residents who are low-income and living more than one mile from a supermarket—42.4% and 59.9% respectively—compared to the county's 10.5%. This could be the result of developers' reluctance to undertake new projects in an area perceived to have environmental risk. Vacant and rundown properties also are known magnets for crime. The Greenville Police Department creates annual major crimes hot spot maps detailing sections of the city where major crimes, such as robberies or aggravated assaults, are most prevalent. West Greenville, one of the RRRA's neighborhoods, consistently appears on those maps. These dilapidated sites also are impediments to some of the area's amenities. An impact study completed in June 2013 on the Swamp Rabbit Trail (SRT), the nearly 20-mile-long greenway that runs through the heart of the RRRA and connects to Greenville's downtown, indicates low usage from surrounding neighborhoods. According to the study, this trail is accessed by more than 501,000 users annually and just under 10% of trail users are minorities. Since 78% of the RRRA's population are a minority, this suggests barriers like brownfields may prevent residents from accessing and using the trail. As the City starts to build the RRRA's City Park on the site of its former Public Works Operations Center and adjacent to the SRT, addressing these brownfields barriers will become increasingly important so residents can safely connect to these amenities. A severe affordable rental housing deficit that is impacting the entire city is also affecting the RRRA. An affordable housing study conducted by czb for the City in 2016 reports that as recently as 2000 Greenville had an excess of low-cost rentals (\$500/month in today's dollar); today, Greenville is short by 2,500 such units. As the City corrects this shortage by working with developers to locate affordable housing developments citywide, using brownfields assessments to identify suitable locations and alleviate developers' environmental concerns in the RRRA will benefit its residents, especially given the area's high poverty and rental rates.

**ii) Cumulative Environmental Issues:** Other environmental concerns in the RRRA include: a very active Norfolk Southern and CSX railways intermodal transfer center, Amtrak Station, and rail line that spans the project area's northern portion; the presence of the Reynolds Company, a manufacturer of water-based, hot-melt and dry-blended adhesives; and the City's 27.67-acre Public Works Operations Center. In use since the 1960s, the Operations Center houses most of the City's fleet and vehicle maintenance services. Though the Center's relocation will be complete in December 2017, the facility is likely to have had environmental impacts on the site

that will need to be mitigated by the City, in addition to site demolition. The RRRA's neighborhoods have been saddled with the air emissions, chemical releases, dust, stormwater runoff (160 acres of the RRRA's 350-acre planning area sits in the Reedy River's flood zone), and noise pollution from each of these facilities for more than 50 years, not including the rail lines which date back to the mid-1850s. Not surprisingly, given these cumulative environmental concerns, per the EPA's Environmental Justice Screening and Mapping Tool (EJSCREEN) (accessed October 2017), the RRRA's census block groups are prone to above State average amounts of particulate matter, ozone, and diesel particulate matter. Traffic proximity and volume (daily traffic count/distance to road) is also abnormally high for the area—one census block group in Tract 7 reported a value of 270 compared to the State's 53.

**iii) Cumulative Public Health Impacts:** The cumulative public health impacts arising from the RRRA's brownfields and the facilities discussed above are numerous and can be linked to chemical stressors, like increased amounts of particulate matter in the air, and non-chemical stressors, such as living in poverty. Past Environmental Site Assessments (ESAs) conducted in the RRRA found elevated levels of lead, polychlorinated biphenyls (PCBs), and volatile and semi-volatile organic compounds—contaminants indicative of the area's textile history, according to an EPA Report titled "*Revitalizing America's Mills: A Report on Brownfields Mill Projects.*" Both the EPA and the International Agency for Research on Cancer have determined that PCBs are carcinogenic. According to a 2016 Community Health Needs Assessment (CHNA) performed by the local Bon Secours St. Francis Health System, the leading cause of death in Greenville County is cancer, followed by heart disease, and then chronic lower respiratory disease. The CHNA also reported African Americans have higher death rates due to cancer than other groups—a potential concern for the RRRA's 78% minority population. The EJSCREEN reports mentioned above also indicate the cancer risk and respiratory hazard index is higher in the RRRA than the rest of the State which corroborates the CHNA's findings.

Exacerbating these negative chemical stressors are the area's non-chemical stressors linked to the area's disproportionate number of brownfields. According to the Centers for Disease Control and Prevention these stressors, or conditions, are known as social determinants of health (SDOH), and the differences in health are striking in communities like the RRRA with poor SDOH such as unstable housing, low-income, and unsafe neighborhoods. Echoing this information, the CHNA lists limited or no access to safe places to live and exercise, poor nutrition, and food insecurity as substantial issues for Greenville County residents. For example, 14.4% of households have at least one of the following housing problems: overcrowding, high housing costs, lack of kitchen, or lack of plumbing facilities. In Greenville County, 28.5% of adults are obese and 23.4% are sedentary. Aggravating this finding is the fact that RRRA residents have substantially lower access to park and exercise space—only 10.8 acres compared to 145 acres in Nicholtown (another city neighborhood with a low average median income (\$23,598) and majority Black population (80.4%) but is unburdened by brownfields).

Whether it is exposure to PCBs and the possible risk for cancer or poor mental health associated with the stress of balancing high housing costs with grocery bills, the RRRA's residents—nearly all of whom can be considered a sensitive population given the area's high poverty rate (49%), growing number of elderly, and notable percentage (39.4) of women of childbearing age—are shouldering these threats daily. Assessing and clearing the RRRA's properties for affordable housing, recreational space, or grocery stores is vital to addressing residents' exposure to chemical and non-chemical stressors.

### 1.c. Financial Need

**i) Economic Conditions:** In the years immediately following the economic crisis, the City was fortunate to sustain its level and quality of service and staff without raising taxes primarily by making capital project compromises. Now, the City is addressing deferred capital costs, such as the recent opening of a new fire station, alongside the RRRRA's major financial strains like the relocation of the Public Works Operation Center (a \$25 million endeavor) and the RRRRA/City Park planning process (\$573,000). As the City makes these investments in the RRRRA, which are simultaneously striving to realize the RRRRA's revitalization and protect the needs of the area's long-time residents, Brownfields Assessment funding, with its similarly aligned goals, is critical to that process for two key reasons. First, the neighborhoods that comprise the RRRRA **lack the capacity to manage a brownfields project**. Without staff and financial and programmatic protocols, they fully rely on the City to operate a brownfields program that benefits the area. Furthermore, given the area's strikingly low incomes, the residents are financially unable to prompt their own community investment and brownfields redevelopment. Secondly, while the City strives to help its RRRRA residents, **it is enduring continual cutbacks from other equitable development funding allocations**. Since Fiscal Year 2010, the City's funding allocations for Community Development Block Grant (CDBG) and HOME Investment Partnership have decreased by 36% and 48% respectively, which translates into an annual reduction of \$636,597.

**ii) Economic Effects of Brownfields:** The RRRRA's adverse economic effects are most apparent in the area's depressed property values and small number of City-issued business licenses. As first described in section 1.a.ii, home values in the RRRRA average \$98,933—well below the city average of \$221,800. This is likely related to the area's dilapidated conditions, like nearby brownfields, the multitude of substandard rental housing that supports the area's 73% renter population, and higher rate, 14.9%, of vacant homes versus the city's 12.5%. Other property owners have little incentive for upkeep when the property next-door is run-down or abandoned, resulting in widespread blight. When severe property code issues arise, these decrepit properties require demolition which burdens City services. From July 2015 to June 2017 more than 40% of the City's residential demolitions took place in or near the RRRRA at a cost to the City of \$90,256. As shown in the table below, the RRRRA accounts for a very low number of City-issued business licenses and economic activity (total gross receipts) especially when compared to the nearby and smaller downtown area. The contrast may be indicative of business owners' hesitancy to locate in the brownfield-laden RRRRA, which in turn stifles any local job creation that could improve average median household income (\$17,462) and the area's high unemployment rate (11.4%).

Area	# of business licenses issued from 2011-2016	Total gross receipts of licensed businesses from 2011-2016
RRRA	1,171	\$1,141,719,603
Downtown (Main St.)	4,750	\$6,591,275,838
<b>Difference</b>	<b>RRRA has 75% fewer businesses.</b>	<b>RRRA has 83% less in gross receipts.</b>

Source: City of Greenville Revenue and Business License Division

## 2. Project Description and Feasibility of Success

### 2.a. Project Description, Redevelopment Strategy, and Timing and Implementation

**i) Project Description/Alignment with Revitalization Plans:** The RRRRA's poor economic conditions, which range from a high poverty rate amongst its residents to a meager number of local businesses, are undoubtedly tied to the area's glut of dilapidated properties and brownfields. To help the area overcome the economic, environmental, and social barriers connected to its brownfields, this Assessment project will conduct Phase I and II Environmental Site Assessments

(ESAs) on sites within the RRRRA suspected or known to have hazardous substances and petroleum contamination and develop viable cleanup/redevelopment planning activities for those sites. Significant community involvement from residents and other community stakeholders will drive the site selection process for ESAs as well as redevelopment planning to ensure that the RRRRA's majority low-income and minority population both participates in and benefits from project decisions and outcomes.

This project aligns with and catalyzes two recent RRRRA community planning efforts. In 2014, the West Side Comprehensive Plan (WSCP) used an extensive public outreach process to create policy, development, infrastructure, and site-specific recommendations for the RRRRA. Many of the WSCP's land use recommendations, such as constructing City Park and building trail spurs to connect neighborhoods to the area's popular Swamp Rabbit Trail (SRT), align with this project. In 2016, the RRRRA underwent a Strategic/City Park planning initiative. This initiative identified the boundaries of the RRRRA (350 acres encompassing three West Side neighborhoods) and City Park (60 acres along the Reedy River). The main objectives included: laying the foundation for repurposing the City's Public Works Operation Center into park space, guaranteeing equitable development throughout the RRRRA (this was reinforced with widespread community participation in the planning process and was the impetus for the affordable housing study conducted in 2016 and referenced in section 1.b.i), and protecting the Reedy River and its floodplain. Without brownfields assessments to encourage the redevelopment envisioned by the community in these two plans, not to mention the redevelopment activities generated through this project, the RRRRA's transformation from an economically- and environmentally-challenged community to a vibrant one is at risk. Moreover, the enhanced benefits anticipated from positioning the RRRRA's brownfields for redevelopment (as described in sections 4.a and 4.b) may be delayed or never fully realized. This project also advances a FY 2018-2019 EPA Agency Priority Goal as identified in the draft FY 2018-2022 Strategic Plan—"make additional brownfield sites ready for anticipated use." Conducting ESAs on community-identified priority brownfield sites in the RRRRA will position these sites for new uses that will create equitable and sustainable development and deliver enhanced community benefits—like a marketplace and community gardens in City Park—to improve residents' access to healthy and affordable food.

This project also underpins sustainable practices in the RRRRA, a precedent that was set when AJW Elementary (built atop a former RRRRA brownfield) was constructed to silver Leadership in Energy and Environmental Design (LEED) status. Sustainable practices, like filtering runoff to improve water quality, floodplain restoration, and the use of energy efficient lighting will be integrated into City Park's operations to achieve Sustainable SITES Initiative certification. Therefore, assessments conducted through this project not only will support sustainability practices but will help encourage the incorporation of such practices into other area redevelopment projects. This project's dual commitment to fostering and incorporating meaningful community involvement (described in more detail in section 3.a.i) and reducing the impacts of brownfields in the overburdened RRRRA community also supports environmental justice.

**ii) Redevelopment Strategy:** The redevelopment strategy for the properties assessed under this grant will draw on the RRRRA's recent planning efforts—the WSCP and Strategic/City Park Plans—as well as community input captured through the involvement plan described in section 3.a.i. The planning efforts will strengthen the redevelopment strategy since those efforts used considerable community feedback to envision new uses for some of the RRRRA's brownfields. For example, community input has called for the restoration of wetlands near a row of

warehouses as part of City Park. Renewed community input under this grant project will ensure assessment and redevelopment activities are responsive to the community's current needs. The extent to which existing infrastructure in the RRRA can be enhanced or used to support potential redevelopment also will be integrated into the strategy. The City recently completed a series of assessments and inventories on RRRA infrastructure that will directly assist with this component. For example, existing transit routes and stops were assessed for condition and compliance with ADA standards; information on existing stormwater and sanitary sewer systems was analyzed; and pedestrian circulation systems such as sidewalks and trails were inventoried and assessed. Other infrastructure assessments underway include identifying existing overhead utilities by type and determining key recreational and cultural amenities. These various inventories and assessments will ensure as redevelopment is activated by this project it is either adequately supported by existing infrastructure or, where known inadequacies exist, improvement plans are in place to complement the redevelopment activity.

**iii) Timing and Implementation:**

**(a) Contractor procurement:** The City has procurement procedures in place that comply with 40 CFR 31.36 and facilitate efficiency for selecting contractors. To maximize the three-year project timeframe, the project team, in conjunction with the Office of Management and Budget, will prepare a Request For Proposals for a qualified brownfields consultant that will be released when the EPA makes grant announcements in spring 2018. Other internal steps for contractor procurement include: advertising the RFP for a minimum of 30 days; evaluating and scoring RFPs; and awarding and negotiating the contract. It typically takes less than ten weeks to complete this process, as such the consultant will be in place when the project begins on October 1, 2018.

**(b) Site inventory and prioritization process:** A tentative list of priority sites has been generated in conjunction with community stakeholders and as part of the RRRA's recent planning efforts, the WSCP and Strategic/City Park Plans. Once the project is underway, the site inventory will be developed further using the Brownfields Task Force (Task Force). Comprised of community stakeholders, including RRRA residents, the Task Force will act in an advisory capacity for the project (role is described further in section 3.a.i). The Task Force also will be responsible for establishing the criteria for site prioritization which is likely to factor in: real or perceived environmental issues; likelihood that immediate redevelopment plans consistent with community goals—especially the creation of open space and equitable development—will occur; the involvement of a willing seller and financially-viable buyer; and the potential to leverage private investment. The potential for job creation, provision of community services and goods, and enhancement of quality of life also are likely considerations.

**(c) Obtaining and securing site access:** The City has started a RRRA Land Bank which is currently comprised of 50 acres (24 acres for park area/26 acres for redevelopment opportunities). Some of the potential priority sites are in the Land Bank, meaning as the property owner the City can guarantee immediate access to these sites. As the City acquires additional property in the area for the Land Bank (and to the extent these properties are considered a priority for this project), it will require site access for assessment as part of the acquisition process. To gain access to any privately-owned sites, the City will meet one-on-one with property owners to discuss the value of participating. To generate interest amongst property owners in the RRRA, presentations and resources will be shared with local brokers, developers, attorneys, lenders, and design professionals as well via Quarterly Real Estate breakfasts (hosted by the City). The City has successfully used these methods to secure site access from private property owners in the past.

However, should a property owner refuse to participate, the City will simply redirect its efforts to the next priority site, especially since there is not a scarcity of properties in need of assessment given the number of sites identified through recent planning efforts, input from stakeholders, and the City's own work acquiring land for the Land Bank.

## **2.b. Task Descriptions and Budget Table**

**i) Task Descriptions:** Greenville is requesting \$200,000 to assess RRRRA properties with possible hazardous substance contamination and \$100,000 for properties with possible petroleum contamination. Funding will be used to conduct community outreach, Phase I/II ESAs, and cleanup/ redevelopment planning activities. The City has an interdepartmental team, including a dedicated project director, in place to manage the project, and per section 2.a.iii (a) will hire an experienced brownfield consultant (labeled as contractor in the budget table) to provide additional programmatic and technical support. Project costs were estimated using costs the City incurred during its 2014 Community-Wide Assessment Grant and verified with industry partners.

Task 1 - Community Engagement and Outreach activities include: holding meetings with local residents; updating project brochure and website; offering Brownfields Lunch and Learn Series (two/year); maintaining opt-in monthly electronic newsletter; producing social media updates; meeting with prospective buyers/developers and property owners; attending relevant meetings, workshops and conferences sponsored by the EPA and/or the South Carolina Department of Health and Environmental Control (SCDHEC); developing brownfields lesson plan for Carolina High School (located near RRRRA) students; offering 6 educational pop-up events; and convening the Brownfields Redevelopment Task Force (Task Force) which will meet quarterly for a total of 12 meetings. Funds allocated for this task total \$30,000 (Hazardous-\$20,500, Petroleum-\$9,500) and include: personnel expenses (\$14,000) to fund a portion of the project director's salary to implement all task activities listed above; travel expenses (\$14,000) for relevant workshop/ conference attendance; and supplies (\$2,000) for software, printing, and outreach materials.

Task 2 - Phase I and II ESAs will be performed (by a qualified brownfields consultant in accordance with the All Appropriate Inquiries regulation) on sites prioritized by the Task Force. The following activities will be completed by the brownfields consultant with oversight by the City: 14 hazardous and 10 petroleum Phase I ESAs will be conducted in accordance with ASTM E1527-13 at an estimated cost of \$2,500 per assessment depending on property size and site complexity; and 3 hazardous (at a cost of \$35,000 each) and 2 petroleum (at a cost of \$20,000) Phase II ESAs in accordance with ASTM E1903-11. Phase II ESA costs may vary according to property size, site complexity, and degree of contamination. The consultant also will complete: site-specific Quality Assurance Project Plans, Health & Safety Plans, Historic Properties or Threatened and Endangered Species Surveys, asbestos-containing material and lead-based paint surveys, and provide assistance in negotiating Voluntary Cleanup Contracts/Brownfields Agreements with SCDHEC as needed. These costs are factored into the price for Phase II ESAs. Funds allocated for this task total \$225,000 (Hazardous-\$153,125, Petroleum-\$71,875) and are distributed amongst: contractual expenses (\$205,000) for brownfields consultant; and personnel expenses (\$20,000) to fund a portion of the project director's salary for consultant oversight.

Task 3 - Cleanup/Redevelopment Planning will be guided by community input and completed by the consultant with oversight by the City. Cleanup activities include calculating cleanup costs and determining the best way to proceed with redeveloping the properties. This information will be summarized in an Analysis of Brownfields Cleanup Alternatives (ABCA). The City anticipates developing 4 ABCAs over the course of the project (2 hazardous/2 petroleum) at a cost of

approximately \$3,000 per document. Redevelopment will consider community input, recent planning efforts, desired end use and environmental contamination issues; it will include meetings with the impacted communities and with prospective purchasers, developers and lenders. Funds allocated for this task total \$45,000 (Hazardous-\$26,375, Petroleum-\$18,625) and include: contractual expenses (\$12,000) for brownfields consultant; and personnel expenses (\$33,000) to fund a portion of the project director's salary for consultant oversight.

In addition to these activities, the project director will update the Assessment, Cleanup and Redevelopment Exchange System (ACRES) and oversee all other grant performance and financial reporting. The City's in-kind commitment of \$103,473 will fund this activity.

**ii) Budget Table:**

Budget Categories	Task 1-Outreach	Task 2-ESAs	Task 3-Redevelopment	Total
<b>Hazardous Substances</b>				
Personnel	\$5,535	\$6,785	\$11,000	\$23,320
Fringe Benefits	\$4,965	\$6,340	\$9,375	\$20,680
Travel	\$9,500	\$0	\$0	\$9,500
Supplies	\$500	\$0	\$0	\$500
Contractual	\$0	\$140,000	\$6,000	\$146,000
<b>Total</b>	<b>\$20,500</b>	<b>\$153,125</b>	<b>\$26,375</b>	<b>\$200,000</b>
<b>Petroleum</b>				
Personnel	\$1,730	\$3,730	\$6,700	\$12,160
Fringe Benefits	\$1,770	\$3,145	\$5,925	\$10,840
Travel	\$4,500	\$0	\$0	\$4,500
Supplies	\$1,500	\$0	\$0	\$1,500
Contractual	\$0	\$65,000	\$6,000	\$71,000
<b>Total</b>	<b>\$9,500</b>	<b>\$71,875</b>	<b>\$18,625</b>	<b>\$100,000</b>
<b>Grand Total</b>	<b>\$30,000</b>	<b>\$225,000</b>	<b>\$45,000</b>	<b>\$300,000</b>

**2.c. Ability to Leverage:** The City will leverage additional funds and resources to ensure project success. Per the attached letter, **the City will commit \$103,473 in salary/benefits for the Brownfields project director.** The City also expects to see a substantial return on the EPA's investment in the form of private capital investment and jobs created, given the City used past EPA Brownfields funds to leverage over \$86 million in capital and operating endowment investments and 176 full time jobs. The City also is making its own substantial capital investments in the RRRRA. These investments include installing a \$90,000 water quality unit adjacent to the Reedy River and near the current Public Works Operations Center to mitigate pollutant particles flowing into the river and allocating more than \$573,000 for the RRRRA Strategic/City Park Plans process. In addition to these investments, the City is preparing to invest more than \$39.4 million in the RRRRA and City Park. Specifically, the City is relocating its Public Works Operations Center to make way for City Park—a \$25 million-plus endeavor. Once the new center is operational in December 2017, the City will invest \$3.5 million to demolish its facilities in the RRRRA. An active Federal Emergency Management Agency (FEMA) Hazard Mitigation Grant in the amount of \$265,569 will support this demolition. Phase I of City Park is expected to begin in 2018 and cost \$10.9 million, which will be funded through a combination of federal, state, and local funds and private donations. The City's Phase I park investment alone, which is directly tied to a key project redevelopment strategy, would leverage more than \$36 for every dollar invested by the EPA.

### **3. Community Engagement and Partnerships**

#### **3.a. Engaging the Community**

**i) Community Involvement Plan:** The City is adept at involving its citizens in municipal projects and planning activities and will capitalize on that expertise for this project. The momentum generated by recent planning efforts in the RRRRA also will bolster community involvement for this project. For instance, the RRRRA's Strategic/City Park planning initiative completed in 2016 used 18 community stakeholder meetings to solicit and incorporate feedback from more than 300 residents. Successes like this underscore the City's strong commitment to community engagement throughout this project and ability to implement a robust community involvement plan.

The community involvement plan aims to foster purposeful community participation across all age ranges. The City will convene a Brownfields Task Force (Task Force) comprised of the community stakeholders described in section 3.c.i. The Task Force will act in an advisory capacity and will: provide guidance on site prioritization, cleanup decisions, and reuse planning; assist with community activities and outreach materials; and act as the liaison between the project team and the community members they represent. To reach property owners, business organizations, developers and lenders, the City will present semi-annual project status updates and presentations to the Village of West Greenville and the West End Business Associations and at the City-hosted Quarterly Real Estate breakfast meetings. Public Lunch and Learn events at various locations throughout the RRRRA will showcase successful brownfields redevelopment projects, resources available to address brownfields concerns, and provide project updates.

The City also plans to develop a brownfields lesson plan for Carolina High School students. The lesson plan will educate students (many of whom are from the RRRRA) about brownfields' impacts on communities, remediation methods, and nearby repurposed properties. To extend educational opportunities to the broader public, the City is planning to host a series of educational pop-ups in conjunction with community stakeholders. The pop-ups will occur on or near popular repurposed brownfields throughout the RRRRA and serve as a unique and interactive method for engaging new audiences—perhaps meaningfully connecting residents who may not have time to attend community meetings to the project. For example, as family members line-up as much as an hour before AJW Elementary afternoon dismissal, a pop-up at this former brownfield could share information about brownfields and redevelopment, and encourage project participation.

At RRRRA Neighborhood Association meetings for Southernside (11/9/2017), West Greenville (11/14/2017), and the West End (11/7/2017) City staff informed attendees of this proposal.

**ii) Communicating Progress:** The City knows effective public engagement needs to include a variety of outlets. This promotes convenient and equal access to important project information regardless of whether a resident works third shift or a business owner cannot leave the store unattended. For this reason, the City will use communication methods that are intentionally wide-ranging and largely accessible at any time of day, like a Brownfields webpage, to promote accessibility and participation. Accordingly, when scheduling public meetings, the City will strive to schedule those meetings at a variety of times and locations to ensure greater accessibility. Past experience suggests good outlets for soliciting involvement from the RRRRA's aging population are local churches, neighborhood meetings, and Task Force members who are well-respected community peers. Information dissemination, progress reports and solicitation of feedback will occur via: Task Force members; public and community group meetings; project brochures and website; brownfields lesson plans; educational pop-ups; newspaper articles in *The Greenville News*, *Greenville Journal* and *Greenville Magazine*; the Brownfields Lunch and Learn Series;

public notices; advertisements; monthly e-newsletter; and social media (via the City's Facebook page and Twitter account). According to 2011-2015 American Community Survey (ACS) Estimates, 92% of the RRRA population speaks English as a first language; therefore, it is not anticipated that a translator will be needed for community engagement activities. However, the City will provide one if necessary.

### 3.b. Partnerships with Government Agencies:

**i) Local/State/Tribal Environmental Authority:** If ESAs uncover adverse contaminants SCDHEC Region 2 Public Health Office will assist with mitigating potential public health risks. The City maintains a strong relationship with SCDHEC's Upstate Environmental Affairs Regional office (the first point of contact in local environmental oversight structure) and will regularly consult with this office on priority properties as well as regulatory and cleanup standards. The City also collaborates with SCDHEC's Brownfields Program and hosted speakers from this office at a Lunch and Learn in 2016. Along with seeking technical guidance and consultation on properties potentially eligible for SCDHEC's Brownfields/Voluntary Cleanup Program & Revolving Loan Fund, the City will continue to work with the state Brownfields office on education efforts.

**ii) Other Governmental Partnerships:** In 2010, the Army Corps of Engineers performed an initial assessment of the Reedy River's potential impacts on adjacent development and the need for open space. This relationship will inform future cleanup/redevelopment plans. The City also is working with the SC Emergency Management Division to demolish a portion of its Public Works Operations Center using a FEMA Hazard Mitigation Grant. Other federal and state agencies relevant to this project include: the U.S. Department of Housing and Urban Development (CDBG and HOME funds are used in the RRRA for property acquisition, residential development, and other neighborhood activities); and the SC Department of Transportation (coordination of streetscaping efforts tied to potential redevelopment along state-owned roads). The City also will work with the Greenville Housing Authority. They are currently renovating the Brookhaven affordable housing community in the RRRA and have future plans to build a 42-unit senior housing complex in the area which will support the area's affordable housing needs.

### 3.c. Partnerships with Community Organizations

**i) Community Organization Descriptions & Roles:** Committed project partners are listed below.

Community Organization	Organization Description	Project Role
<b>Carolina High School</b> Contact: Michael Delaney Phone: 864-355-2310	Provides students with experiences that are academically excellent and socially equitable.	Task Force member, brownfields lesson plan development.
<b>Furman University's David E. Shi Center for Sustainability</b> / Contact: Weston Dripp / Phone: 864-294-3392	Promotes study/practice of sustainability on campus and in greater Greenville community.	Task Force member, host community meetings.
<b>LiveWell Greenville</b> Contact: Sally Willis Phone: 864-230-6127	Public/private organizations making Greenville County a healthier place to live/work.	Task Force member, provide community learning activities (gardening and cooking demos).
<b>Mill Community Ministries</b> Contact: Dan Weidenbenner Phone: 864-214-6709	Collection of social entrepreneurs working to help under-resourced communities.	Task Force member, educational workshops/pop-ups, facilitate project benefits (community gardens).
<b>Soteria Community Development Corporation</b> / Contact: Jerry Blassingame / Phone: 864-449-6684	Empowers low-income people. Offers jobs in recycling service, deconstruction, and salvage.	Task Force member, spur job opportunities related to sustainability and brownfields redevelopment.
<b>Southernside Neighborhoods in Action</b> / Contact: Mary Duckett	Adopted master plan neighborhood in RRRA. A low to moderate	Task Force member, share Information, and encourage residents

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Community Organization	Organization Description	Project Role
Phone: 864-235-5785	income community (per HUD).	to participate in project.
<b>Sunbelt Human Advancement Resources (SHARE)</b> / Contact: Bruce Forbes / Phone: 864-269-0700	Provides programs that help low-income residents become self-sufficient.	Task Force member, help facilitate new job opportunities.
<b>Upstate Forever</b> / Contact: Heather Nix / Phone: 864-250-0500, ext. 25	Promotes sensible growth, protects special places in Upstate region.	Task Force member, provide community education, host meetings.

The City plans to work with other organizations located in or serving the RRRA including: AJW Elementary, Hampton-Pinkney Historic District, Lake Conestee Nature Park, the Kroc Center, and the West End and West Greenville Neighborhood Associations on additional outreach efforts.

ii) **Letters of Commitment:** Letters from organizations listed in the table above are attached.

**3.d. Partnerships with Workforce Development Programs:** Soteria Community Development Corporation and SHARE will help connect RRRA residents to job opportunities associated with assessment, cleanup, or redevelopment. Soteria's GreenStart program provides transitional job opportunities in the deconstruction and reclamation sectors to people facing significant obstacles to employment. SHARE's Lifelong Advancement through Diligence, Determination, and Employment Resources Program provides comprehensive jobs training/improvement and placement. The City will keep these partners and other workforce development programs, like the Greenville County Workforce Development Board, apprised of employment needs connected to this project. The City also will encourage project consultants to contact these agencies for employment needs and to work with local businesses when practical. No local entities are Brownfields Job Training grantees.

#### **4. Project Benefits**

**4.a. Welfare, Environmental, and Public Health Benefits:** With funding from the EPA's Brownfields Assessment program, the City will assess priority brownfield properties in the RRRA as a building block for the area's renaissance. Since these blighted and vacant properties pose many risks to the community's overall wellbeing, the City anticipates assessing the properties—thereby preparing them for the equitable development purposes envisioned by the RRRA's planning initiatives (the West Side Comprehensive Plan (WSCP) and Strategic/City Park plans, referenced in section 2.a.i)—will alleviate or reverse some of the area's longstanding welfare, environmental, and public health issues.

Key community welfare challenges this project will mitigate include low access to healthy, affordable food and difficulty accessing community amenities. For example, community planning efforts call for a marketplace in old warehouses adjacent to the Swamp Rabbit Trail (SRT) as well as community gardens and urban agriculture in City Park to make food more accessible. New trail spurs and sidewalks will give children and adults safe access to anchor institutions, like the Kroc Center, the SRT, and, eventually, City Park. Other benefits include enabling the development of new educational facilities to tackle the area's poor educational attainment (31.6% of the population lacks a high school diploma) and, over time, the elimination of abandoned properties (likely hot spots for crime) could help reduce the prevalence of crime in the RRRA's West Greenville neighborhood. Given the city's severe shortage of affordable rental housing described in section 1.b.i, clearing property in the RRRA for new affordable housing is integral to addressing this citywide problem as well as providing the area's large renter population (73%) with quality housing. Opportunities for quality housing also will help alleviate adverse housing

conditions, like overcrowding and high housing costs, identified in Bon Secours' CHNA and linked to poor social determinants of health.

This project will facilitate the creation of City Park, anticipated to be one of the city's largest and most active green spaces, and other development throughout the RRRRA. The environmental benefits that go hand-in-hand with green space and infill development are numerous. Upon its completion, City Park is expected to achieve Sustainable SITES Initiative certification meaning its roughly 60 acres will reduce water demand, filter and reduce stormwater runoff, provide wildlife habitat, reduce energy consumption, and improve air quality. The park will be built to withstand flooding from the Reedy River and, by creating more open space along the river, assist with flood mitigation and resiliency. Repurposing the RRRRA's brownfields also supports infill development and the use of existing road, electrical, sewer, and water infrastructure; facilitates new opportunities to introduce clean energy and water efficiency improvements in future developments; and creates opportunities to work with community partners like Soteria to recycle construction and demolition materials and connect area residents to jobs.

Public health benefits associated with this project entail divesting priority properties of chemical stressors, especially as they may be harboring dangerous environmental contaminants. For example, the area's 1.459-acre site formerly known as the Smart Supply Warehouse (assessed and cleaned up with funding funneled from FEMA through the state's Department of Natural Resources Severe Repetitive Loss Program and an EPA Brownfields Hazardous Cleanup grant) was contaminated with lead, arsenic, and polycyclic aromatic hydrocarbons. This once toxic property is now part of the Kroc Center campus. While the extent of potential hazardous substances and petroleum contamination on other RRRRA brownfields sites is unknown, if any match the Smart property's level of contamination, the negative impacts on the area's sensitive populations, just as with the welfare challenges described above, may be considerable. As mentioned in section 1.b.iii, the vast majority of RRRRA's residents can be considered a sensitive population, especially as nearly two out of three households are low-income (per 2011-2015 ACS Census Estimates). Conducting ESAs will help determine the extent of contamination, establish the actions needed to mitigate public health risks, and encourage new development.

**4.b. Economic and Community Benefits:** The WSCP, completed in 2014, and the RRRRA/City Park planning documents, completed in 2016, all produced a similar vision for the RRRRA—a resilient and vibrant community where mixed-income renters and homeowners live, community and recreational interests are abundant, and neighborhood-based businesses meet many of the residents' daily needs in addition to providing more job opportunities. Redevelopment in this area, which must begin with ESAs due to the area's infamous textile heritage, will make significant strides towards achieving this vision as well as positively affecting the lives of its disadvantaged residents. Given the RRRRA's high unemployment rate of 11.4%, one way residents will benefit economically from repurposed brownfields is improved access to living wage jobs and new employment opportunities offered through new development like a high-tech job center/business accelerator space envisioned in the WSCP. Mitigating brownfields and fostering redevelopment also will help increase the RRRRA's low business license numbers detailed in section 1.c.ii. As revitalization continues, business, residential, and recreational uses also will help inflate low property values. Though home values in the RRRRA currently average more than \$122,000 below the rest of the city, 2011-2015 ACS Estimates reveal RRRRA property values are increasing as redevelopment occurs. For example, the value of owner-occupied residences located within the RRRRA's Census Tract 9 increased 159.3% since the 2000 Census (when the City

received its first EPA Brownfields grant). Property values in Census Tracts 7 and 8 also increased at 83.6% and 47.8%, respectively. As more brownfield properties are mitigated, this upward trend is expected to continue and help align the RRRA's property values with the rest of the city. As property values increase, the City also expects the area's 14.9% vacant home rate will drop and to spend fewer resources on demolition in the area. The area also is realizing economic benefits from previous brownfields redevelopments and EPA investments—a 2012 Return on Investment document reports an EPA investment of \$320,445 across five RRRA properties yielded \$60 million in capital investment and 176 full-time jobs.

With the impending removal of the City's Public Works Operation Center, the future development of City Park is imminent which, in addition to the environmental benefits discussed in section 4.a, will deliver other community benefits. It will connect the RRRA's neighborhoods to the SRT and the City's extensive trail network. City Park also will significantly increase RRRA's residents' access to green space, the scarcity of which is a non-chemical stressor linked to the area's brownfields. By increasing the area's park acreage nearly six-fold over its present 10.8 acres, residents will have more opportunities for exercise and recreation to offset obesity and sedentary rates. ESAs will determine if the properties within and adjacent to the park's proposed footprint pose any environmental risks that require mitigation prior to construction. As environmental concerns are remediated, idle brownfields will become prime space for the redevelopment goals envisioned during this project as well as in recent community planning efforts.

## **5. Programmatic Capability and Past Performance**

**5.a. Audit Findings:** The City has received an unmodified opinion on its full financial statements every year. The City's OMB Circular A-133 audit for fiscal year ended June 30, 2015 had a material weakness (completely unrelated to *any* City grant expenditures) in internal control resulting from a development agreement and recording capital assets and related long-term obligations. For fiscal years ended June 30, 2016 and June 30, 2017, no material weakness were identified. In June 2012, the City was randomly selected for an EPA Limited Scope review and was found to have used adequate systems and procedures for its FY09 award.

**5.b. Programmatic Capability:** The City has extensive experience managing EPA Brownfields funding and other federal, state, and local grants. Monique Mattison will serve as the project director. She began her career with the City in 2016 as a neighborhood planner before being promoted to community planner in 2017. She will be overseen and assisted by Ginny Stroud, the Community Development Administrator. Ms. Stroud has overseen the City's Brownfields Program since its inception in 2000. Ms. Mattison and Ms. Stroud are extremely skilled in federal grant management (including managing the City's allocations from HUD's CDBG and HOME programs), planning, community outreach, and managing consultants—all skills that directly translate to meeting this project's technical, administrative, and financial requirements.

To enhance programmatic and administrative project capacity, Ms. Mattison and Ms. Stroud will lead an interdepartmental project team comprised of staff from: the Community Development Division, Parks & Recreation, Public Information & Events, Public Works' Environmental Engineering Division, Finance, and the City Attorney's office. The City also will hire an experienced brownfields consultant to assist with the project. A comprehensive work plan and master schedule will guide the project's execution according to the grant's terms and conditions and will identify deadlines, responsible party for each activity, and set project team meetings.

**5.c. Measuring Environmental Results: Anticipated Outputs/Outcomes:** City staff will maintain control of ACRES reporting to closely monitor and report project progress. All project-related materials, ranging from sign-in sheets to consultant reports, will be electronically maintained and stored on City network space to track outputs, like number of residents involved or number of Phase I ESAs completed, and to facilitate communication with the project team and EPA project manager. The EPA project manager will be invited to participate in project team meetings (via conference call) as needed to evaluate progress and provide troubleshooting. To measure outcomes beyond the 3-year grant period, like redevelopment activities, the City will use Return on Investment documents, internal systems, such as budget and business license data, and Census data to examine area investments, jobs created, and growth in business activity and property values.

**5.d. Past Performance and Accomplishments:**

**i, 1-2) Currently or Has Ever Received an EPA Brownfields Grant:** The City has closed five Brownfields grants. To conserve space, for each project all Quarterly progress reports, MBE/WBE Utilization Forms, Annual Financial Status Reports, Key Measures Forms, and Project Closeout Reports were completed on time and in compliance with terms and conditions. Accomplishments were reported in ACRES and each project closed with \$0.00 in remaining funds.

1) EPA Brownfields Assessment Demonstration Pilot Grant (Year Awarded: 2000, Amount: \$200,000) Accomplishments: 1) 50 potential brownfield sites identified, 2) 27 inquiries from property owners/29 inquiries from potential buyers received, 3) 7 Phase I and 1 Phase II ESAs completed, 4) 9 sites assessed with leveraged funds, 5) 23 partnerships formed to address brownfields, 6) 4 brownfield agreements initiated, 7) \$262,000 leveraged to address environmental issues, 8) 11 cleanup/construction jobs created.

2) EPA Brownfields Hazardous Assessment Grant (Year Awarded: 2006, Amount: \$200,000) Accomplishments: 1) 4 Phase I /3 Phase II ESAs completed, 2) \$58,400 leveraged to address environmental issues, 3) created informational website, 4) published project brochure.

3) EPA Brownfields Community-Wide Hazardous/Petroleum Assessment Grant (Year Awarded: 2009, Amount: \$400,000) Accomplishments: 1) 16 Phase I and 3 Phase II ESAs completed, 2) \$486,500 leveraged City funds, 3) updated website, 4) published brochure, 5) published Return on Investment study of City brownfield projects for use as redevelopment tool, 6) \$23 million in redevelopment funds leveraged for AJW Elementary.

4) EPA Brownfields Hazardous Cleanup Grant (Year Awarded: 2009, Amount: \$200,000) Accomplishments: 1) Corrective measures, including a Stormwater Pollution Prevention Plan, completed in accordance with approved Corrective Measurements Plan and Non-Responsible Party Voluntary Cleanup Contract, 2) \$326,000 leveraged to address environmental issues, 3) \$67 million in redevelopment funds leveraged for the construction/operations of the Kroc Center.

5) EPA Brownfields Community-Wide Hazardous/Petroleum Assessment Grant (Year Awarded: 2014, Amount: \$400,000) Accomplishments: 1) New partnerships with local schools (worked with Carolina High Environmental Science classes) and development community created, 2) Hosted 3 Lunch and Learns (Highlights: Environmental Justice and Developer-specific), 3) Launched e-newsletter and grew readership to 1,580 people.

**5.d.ii) and 5.d.iii)** Not applicable.

**Threshold Criteria Documentation for Community-Wide Assessment Grants**

**1. Applicant Eligibility**

The City of Greenville is a General Purpose Unit of Local Government as that term is defined under 2 CFR 200.64.

**2. Community Involvement**

The City of Greenville is committed to informing and involving the community and a wide range of stakeholders throughout the three-year grant period. City staff members have already made an explicit effort to discuss this grant opportunity and the City's intent to apply for it with the target community, the Reedy River Redevelopment Area (RRRA). Information on the application and the City's brownfields program was shared at three recent neighborhood association meetings within the RRRA—Southernside on November 9, 2017, the West End on November 7, 2017, and West Greenville on November 14, 2017.

This early push to involve the community is indicative of the City's commitment to community and stakeholder engagement throughout the entire three-year grant period. As further detailed in the narrative proposal on pages 8, 10, 11, and 12 a wide range of outreach and involvement activities will be performed to ensure the needs and expectations of residents and community stakeholders are fully factored into the project. These activities include, but are not limited to, holding meetings with local residents, distributing project updates through e-newsletters and social media outlets, and administering a brownfields lesson plan that will educate high school students about brownfields. The City also is excited to introduce a new outreach tactic through this project—educational pop-ups. The City envisions these pop-ups occurring on or near repurposed brownfields, such as sections of the popular Swamp Rabbit Trail or on the campus of A.J. Whittenberg Elementary, to educate passers-by about brownfields and the benefits to the community when they are repurposed as well as to encourage involvement in the project. An advisory board, called the Brownfields Task Force, and comprised of target area residents and stakeholders, will be convened to help direct project decisions ranging from site prioritization to redevelopment plans, as well as assist with community involvement and outreach. Furthermore, eight different community organizations, with direct ties to the Reedy River Redevelopment Area and its revitalization, will be involved in this project.

The City of Greenville has extensive experience executing comprehensive outreach campaigns, particularly in regards to brownfields, as evidenced by its successful completion of the following five different Environmental Protection Agency (EPA) grant projects: a Brownfields Assessment Demonstration Pilot project awarded in 2000, a Brownfields Community-Wide Hazardous Assessment project awarded in 2006, a Brownfields Hazardous Cleanup grant awarded in 2009, a Brownfields Community-Wide Hazardous/Petroleum Assessment grant awarded in 2009, and a Brownfields Community-Wide Hazardous/Petroleum Assessment grant awarded in 2014.

**This application is for a community-wide assessment grant; therefore, no site-specific property information is required.**

**SF-424**

**Question 14: Areas Affected by Project (Cities, Counties, States, etc.)**

The areas affected by this project are the City and County of Greenville, South Carolina.

# Application for Federal Assistance SF-424

## \* 1. Type of Submission:

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

## \* 2. Type of Application:

- ☒ New  
☐ Continuation  
☐ Revision

## \* If Revision, select appropriate letter(s):

## \* Other (Specify):

## \* 3. Date Received:

11/14/2017

## 4. Applicant Identifier:

## 5a. Federal Entity Identifier:

## 5b. Federal Award Identifier:

## State Use Only:

## 6. Date Received by State:

## 7. State Application Identifier:

## 8. APPLICANT INFORMATION:

### \* a. Legal Name:

City of Greenville

### \* b. Employer/Taxpayer Identification Number (EIN/TIN):

57-6000236

### \* c. Organizational DUNS:

0703727270000

## d. Address:

### \* Street1:

206 South Main Street

### Street2:

### \* City:

Greenville

### County/Parish:

### \* State:

SC: South Carolina

### Province:

### \* Country:

USA: UNITED STATES

### \* Zip / Postal Code:

29601-2832

## e. Organizational Unit:

### Department Name:

Economic Development

### Division Name:

Community Development

## f. Name and contact information of person to be contacted on matters involving this application:

### Prefix:

Ms.

### \* First Name:

Monique

### Middle Name:

### \* Last Name:

Mattison

### Suffix:

### Title:

Community Planner

### Organizational Affiliation:

City of Greenville

### \* Telephone Number:

864-467-4574

### Fax Number:

864-467-5735

### \* Email:

mmattison@greenvillesc.gov

**Application for Federal Assistance SF-424**

**\* 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

**Type of Applicant 2: Select Applicant Type:**

**Type of Applicant 3: Select Applicant Type:**

**\* Other (specify):**

**\* 10. Name of Federal Agency:**

Environmental Protection Agency

**11. Catalog of Federal Domestic Assistance Number:**

66.818

**CFDA Title:**

Brownfields Assessment and Cleanup Cooperative Agreements

**\* 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-17-07

**\* Title:**

FY18 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

**13. Competition Identification Number:**

**Title:**

**14. Areas Affected by Project (Cities, Counties, States, etc.):**

1235-GreenvilleSC\_AreasAffectedByProject.pd

Add Attachment

Delete Attachment

View Attachment

**\* 15. Descriptive Title of Applicant's Project:**

Brownfields Hazardous/Petroleum Community-Wide Assessment for the City of Greenville's Reedy River Redevelopment Area.

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

## Application for Federal Assistance SF-424

### 16. Congressional Districts Of:

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

### 17. Proposed Project:

\* a. Start Date:

\* b. End Date:

### 18. Estimated Funding (\$):

* a. Federal	<input type="text" value="300,000.00"/>
* b. Applicant	<input type="text" value="0.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="300,000.00"/>

### \* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- ☒ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☐ c. Program is not covered by E.O. 12372.

### \* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

### Authorized Representative:

Prefix:  \* First Name:   
Middle Name:   
\* Last Name:   
Suffix:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:



The City of  
**GREENWOOD**  
South Carolina

P.O. Box 40  
Greenwood, South Carolina 29648-0040  
www.cityofgreenwoodsc.com

R04-18-C-010

November 13, 2017

Ms. Barbara Alfano, Regional Brownfields Coordinator  
Environmental Protection Agency Region 4  
Atlanta Federal Center  
61 Forsyth Street  
Atlanta, Georgia 30303

RE: City of Greenwood, South Carolina  
EPA Brownfields Hazardous Cleanup Grant Proposal

Dear Ms. Alfano:

On behalf of the City of Greenwood, South Carolina, I am pleased to submit the enclosed application for an Environmental Protection Agency (EPA) Brownfields Hazardous Cleanup Grant for the former Greenwood Foundry Site. This cleanup grant is a follow-up to the successful hazardous brownfield assessment grant we were awarded in 2012 with which we assessed this property (and others) as well as a hazardous cleanup grant that we are currently conducting on the Greenwood Mill 5 site.

The Greenwood Mill opened a foundry in Greenwood in 1931 for the production of textile industry cast iron parts. When the textile industry began to wane, the foundry was sold to Synehi Castings, Inc. in 1985. The firm continued to operate as a foundry until 1997. The site was then used for machinery storage until 2004. The Greenwood Housing Authority acquired the foundry site in 2004 and demolished the buildings in 2006. The South Carolina Department of Health & Environmental Control (DHEC) used some of its brownfields funding to perform a Phase I and II Environmental Sites Assessments on the site, but there were data gaps that were addressed by a second Phase II performed under Greenwood's Brownfields Assessment Grant awarded in 2012. Those assessments of the 16.6-acre Former Greenwood Mill Foundry Site identified the presence of elevated levels of metals and Polycyclic Aromatic Hydrocarbons. Today, the property is surrounded on all sides by residential communities, including low-income housing units. This community has been vocal about their desire for a park in their area of the City at least since the first meeting to discuss it was held on July 2, 2013. Also, they are also willing to work in support of the redevelopment of the foundry site into a community park, so our work is truly community driven, so much so that the County voted for a Capital Project Sales Tax in 2016 with this park being one of the projects to be assisted by the funding.

This grant will allow the City to mitigate the environmental risks and restore the property so that a park can be built on the south side of the City.

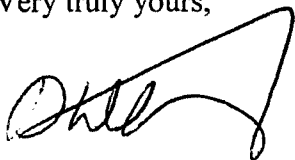
**a. Applicant Identification:**

City of Greenwood, South Carolina  
Mailing Address: Post Office Box 40  
Greenwood, South Carolina 29648  
Physical Address: Municipal Building  
520 Monument Street (29646)

- b. Funding Requested:**  
i): **Grant Type:** Single Site Cleanup  
ii): **Federal Funds Requested:** \$200,000; no cost share requested  
iii): **Contamination:** Hazardous Substances
- c. Location:** City of Greenwood, Greenwood County, South Carolina
- d. Property Information:** Greenwood Foundry  
122 Foundry Road  
Greenwood, South Carolina 29646
- e. Contacts:**
- |  |   |
|--|---|
| <b>i) <u>Project Director:</u></b><br>Ms. Steffanie C. Dorn, Finance Director<br>City of Greenwood<br>Post Office Box 40<br>Greenwood, South Carolina 29648<br>Phone: (864) 942-8416<br>E-mail: <a href="mailto:steffanie.dorn@gwdcity.com">steffanie.dorn@gwdcity.com</a> | <b>ii) <u>Highest Ranking Elected Official</u></b><br>The Honorable Welborn Adams, Mayor<br>City of Greenwood<br>Post Office Box 40<br>Greenwood, South Carolina 29648<br>Phone: (864) 942-8421<br>E-mail: <a href="mailto:wadams@tinsleyadams.com">wadams@tinsleyadams.com</a> |
|--|---|
- f. Population:**  
City of Greenwood –24,974; no persistent poverty
- g. Other Factors Checklist:** The Other Factors Checklist is attached.
- h. Letter from the State or Tribal Environmental Authority:** Ms. Daphne Neel, Bureau Chief for the South Carolina Department of Health and Environmental Control's (SCDHEC) Bureau of Land and Waste Management, issued a letter acknowledging this grant proposal and the Department's support of the planned cleanup activities at the Greenwood Foundry Site for the City of Greenwood. The SCDHEC letter is included as an attachment.

Thank you for your time and consideration. If you should have any questions, please do not hesitate to contact me at (864) 942-8412.

Very truly yours,



Welborn Adams  
Mayor

### Appendix 3

#### Cleanup Other Factors Checklist

Name of Applicant: City of Greenwood, South Carolina

Please identify (with an **x**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	
The jurisdiction is located within, or includes, a county experiencing "persistent poverty" where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	X P. 9, 10
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	



November 10, 2017

Barbara Alfano  
Region 4 Brownfields Coordinator  
United States Environmental Protection Agency  
Resource Conservation and Restoration Division  
61 Forsyth Street SW  
Atlanta, Georgia 30303-8960

RE: EPA Brownfields Cleanup Grant  
City of Greenwood, South Carolina

Dear Ms. Alfano:

The South Carolina Department of Health and Environmental Control, the State's environmental authority, acknowledges and fully supports the City of Greenwood's application for a Brownfields Cleanup Grant. The grant will facilitate environmental cleanup of Greenwood Foundry site to be redeveloped as a needed city park in Greenwood, South Carolina.

The Department appreciates your consideration of the application and hopes for a favorable outcome. Your positive response will assist the City in its efforts to revitalize properties in the community. If you have any questions or need additional information, please contact Robert Hodges of my staff at (803) 898-0919.

Sincerely,

A handwritten signature in cursive script that reads 'Daphne Neel'.

Daphne Neel, Chief  
Bureau of Land and Waste Management

cc: Chris McClusky, Upstate EA Anderson  
Robert Hodges, Manager, Brownfields Program

# NARRATIVE PROPOSAL/RANKING CRITERIA

## 1. COMMUNITY NEED

### 1.a. Target Area and Brownfields

#### 1.a.i. Community and Target Area Descriptions

The City of Greenwood was chartered in 1857 at a major railroad crossroads in northwestern South Carolina. The city's first textile mill, Greenwood Mill, opened in 1890 and – due to the railroads – the city quickly became a hub for textile manufacturing with additional mills established around the turn of the century. The Greenwood Mill opened a foundry in Greenwood in 1931 for the production of textile industry cast iron parts. Typical of most textile-founded towns across the south, mill villages sprang up adjacent to the mills, providing housing and a sense of community to the workers and their families who made their lives there. Along with the growth of the textile industry, other businesses prospered – grocery stores, restaurants, laundry and dry-cleaning facilities, and retail shops. Lander University, a state-assisted coeducational college, came to Greenwood in the early 1900s. From 1900 to 1950, Greenwood prospered and thrived with a steadily rising population. As textile production shifted to factories overseas, Greenwood's core industry began to wane. In 1995, the flagging Greenwood Mill was sold to Facemate Corporation, a medical textile company. All activity at the mill ceased in 2003 when Facemate declared bankruptcy. A salvager then acquired the property and began demolishing the buildings until he was stopped for failing to do asbestos abatement prior to demolition; thus, the community was left with dilapidated buildings, asbestos containing debris, and ongoing environmental, health and safety hazards for the community. The associated foundry was leased to Synehi Castings, Inc. in 1985. The firm continued to operate as a foundry until 1997. The site was then used for machinery storage until 2004. The Greenwood Housing Authority acquired the foundry site in 2004 and demolished the buildings in 2006. The community, with the assistance of the US Environmental Protection Agency (EPA), has worked to assess and create a vision for the redevelopment of the former foundry. Environmental assessments were completed at the foundry site as well with the EPA Brownfields Assessment Grant awarded to the City in 2012. Those assessments of the 16.6-acre Former Greenwood Mill Foundry Site identified the presence of high levels of metals, Polycyclic Aromatic Hydrocarbons (PAHs), and Polychlorinated Biphenyls (PCBs). Today, the property is surrounded on all sides by residential communities, including low-income housing units. This community has been vocal about their desire for a park in their area of the City at least since the first meeting to discuss it on July 2, 2013. Also, they are willing to work in support of the redevelopment of the foundry site into a community park.

#### 1.a.ii. Demographic Information and Indicators of Need

The Former Greenwood Foundry Site is surrounded by residential homes, including an adjacent public housing community. Neighborhoods adjacent to or within easy access to the proposed park include the communities of Blyth Heights, Mathews, Wisewood, New Market Park, Panola, Coleman Court/South Creek, and the Housing Authority. As the demographic table illustrates, the area containing and immediately surrounding the site (i.e. the Target Area defined as Census Tract 9708) is comprised of nearly twice as many minority community members (58.6%) as Greenwood County (36.1%) and South Carolina as a whole (32.8%). In addition, the Target Area has a significantly higher concentration of children under 14 (28.2%) compared with the City of Greenwood (21.1%), Greenwood County (19.5%) and South Carolina (18.8%). The community is also characterized by lower educational attainment, income, and home values than comparison geographies while also having higher families with children living in poverty (47.2%) and households with food stamp/SNAP benefits (33.3%). This means that nearly a third of community is comprised of children in the prime park-going years with little-to-no recreational opportunities in the area exposed to the risks of the environmental, health, and safety hazards on this vacant property which is likely to attract children who want to explore the neighborhood.

These children are much more likely to come from low-income and minority families than the City of Greenwood as a whole making this site a social justice concern for the city.

**Target Area and Comparison Geographies**  
ACS 2015 5-year estimate data, Census.gov October 2017

Demographic	Target Area (Tract 9708)	City of Greenwood	Greenwood County	South Carolina	United States
Population	9,429	24,974	69,771	4,777,576	316,515,021
Percent Minority (Alone)	58.6%	50.7%	36.1%	32.8%	26.4%
Percent African-American (Alone)	52.7%	43.3%	31.1%	27.5%	12.6%
Percent Hispanic (Alone)	6.9%	12.2%	5.7%	5.3%	17.1%
Percent Children (5 -under)	8.0%	8.5%	6.6%	6.1%	6.3%
Percent Children (5-14)	20.2%	12.6%	12.9%	12.7%	13.0%
Percent Elderly (65-over)	12.5%	15.6%	16.4%	15.2%	14.1%
Percent Women of Child Bearing Age	24.9%	31.2%	24.9%	23.8%	24.1%
High School Graduate or Higher	69.6%	72.1%	80.8%	85.6%	86.7%
Bachelor Degree or Higher	12.9%	20.4%	23.0%	25.8%	29.8%
Families with Children Below Poverty (ul8)	47.2%	44.1%	30.4%	22.0%	18.0%
Per Capita Income	\$15,982	\$15,996	\$21,287	\$24,604	\$28,930
Households with Food Stamp/SNAP	33.3%	27.6%	18.2%	15.1%	13.2%
Median Household Income	\$25,537	\$24,593	\$37,060	\$45,483	\$53,889
Unemployment Rate	9.8%	14.7%	12.9%	9.5%	8.3%
Median Home Value	\$76,800	\$87,800	\$104,900	\$139,900	\$178,600
Percent Vacant Homes	11.6%	16.2%	14.1%	16.5%	12.3%
Percent Rental Homes	48.7%	55.5%	34.7%	31.4%	36.1%

The EPA Environmental Justice Screening tool indicates the 2,328 residents in the census block group containing the Former Greenwood Mills Foundry Site (450479708002) have a very high concentration of children under 5 years of age (97 percentile for South Carolina and 96 percentile nationally), low income residents (92 percentile for both the state and nation), residents with less than a high school education (94 percentile and 90 percentile), and minority concentration (89 percentile and 81 percentile) – yet a very low percentage of residents over age 64 (11 percentile for the state and 18 percentile for the nation).<sup>1</sup> It is a young community.

*1.a.iii. Description of the Brownfields*

The 16.6-acre foundry site changed over the years of its operation and has many distinct features. The foundry itself was located in the northwestern portion of the property and consisted of four corrugated steel structures – now removed – with an estimated area of 16,000 square feet. The site was contained within an approximate 5-acre fenced compound. An open field of approximately 1.6 acres, located south of the foundry building and fenced compound, was likely used as a parking area. The foundry had a dirt floor until as late as the 1940s. Since the 1960s, aerial photographs identify areas of black discoloration and limited vegetation (mostly high weeds and brambles) on the northern portion of the property. Residences existed on the southeastern portion of the site from the 1940s until at least the mid-1960s – an area now mostly covered with trees that appear to range between ten and fifty years old. A former railroad terminal was located on the southwestern boundary of the property. A small stream, Brightman's Creek, flows generally northward through the property near its eastern boundary. Approximately 1.3 acres of the property is to the east of the creek and includes wetlands. The 2-3 acres on the west side of the creek appears as disturbed land, suggesting it was possibly used for landfilling activities. Phase I ESAs conducted in 2004, 2007 and 2017 identified black granular material consistent with foundry casting sand in several areas of the property. The 2004 and 2007 Phase I

<sup>1</sup> Source: <https://ejscreen.epa.gov>, Accessed October 2017

ESAs also identified a large area of fine grained black material and limited areas of slag material primarily in the northeastern portion of the property. These materials may not have been observed during the 2017 Phase I ESA due to vegetative overgrowth. The 2017 ESA identified discarded solid waste materials in several areas on the property including tires, two fiberglass boat hulls, a fiberglass boat mold, and household waste. Phase II ESAs were conducted on the property by URS in 2008 and by Cardno in 2014. The 2008 Phase II ESA included sampling and analysis of groundwater, soil, surface water, sediment and foundry waste materials. Results identified lead in groundwater slightly above the primary maximum contaminant level (MCL) standards in the State Primary Drinking Water Regulations, 4 S.C. Code Ann. Regs. 61-58 (2011 & Supp. 2016). Results also identified metals, PAHs and PCBs in soil above levels acceptable for unrestricted use but did not delineate the extent of contamination. The 2014 Phase II ESA included collection of 34 soil borings and selection of 23 samples for laboratory analysis to define the extent of contamination. Results confirmed the widespread distribution of PAHs and metals in soil across the property.

### **1.b. Welfare, Environmental, and Public Health Impacts**

#### **1.b.i. Welfare Impacts**

The Former Greenwood Mills Foundry Site is surrounded by low-income residential communities, including areas of subsidized housing. A community center is located adjacent to the property. While the blight from the foundry's structures was removed in 2006, the site represents an ongoing risk to the community's welfare. The lack of recreational facilities for the area's large youth and child populations and ready access to the site's woodlands and fields increases the risk of exposure to harmful contaminants, including the black sand/slag present on the property. Environmental assessments have concluded that these exposed sources of environmental hazards represent a health risk from direct contact with these piles. Unfortunately, neighborhood children are regularly observed playing on and crossing the site. The presence of brownfields – their associated problems of blight, vandalism, and vagrancy – indirectly contribute to Greenwood's high crime rate. Homefacts gives the City of Greenwood a C- Total Crime Index rating and a D+ Violent Crime Index rating. The site identifies a crime index in violent crime, aggregated assault, burglary, and larceny theft all more than double the national average with murder, robbery, and property crimes only slightly less than double.<sup>2</sup> According to the Greenwood Police Department records for thus far in 2017, there have been 12 cases of trespassing, one case of trespassing with possession of drugs and firearms, 5 assaults, 3 juvenile complaints, 3 burglaries, 1 car theft, 2 suspicious person calls, 2 fights, 1 call of possible shots fired, 1 auto break-in, and 1 public drunkenness along Foundry Road near the foundry site. At the same time, the environmental contamination and redevelopment challenges associated with this site limits plans by the community to create much-needed areas for recreational activity. As one mother of two from Blyth Heights noted at a recent community meeting, "To burn off energy now, we have to go all the way across town to the track at the civic center and this park would be right in our back yard." This situation is complicated for many residents by a lack of access to transportation options in the city. According to US Census ACS 2016 5-year estimate data, the number of households in the City of Greenwood with no vehicles available is double the rate of the state as a whole – 14.3% for the city versus 7.0% for South Carolina. Furthermore, half of the households in Greenwood (47.0%) only have access to one vehicle compared to an average of one third of households (33.8%) for South Carolina – meaning families will face transportation challenges accessing recreational opportunities in other areas of the city if that one vehicle is used to commute to work. Currently, no park exists within walking distance of the neighborhoods in the southern sector of the City of Greenwood and public transportation is not

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<sup>2</sup> Source: <https://www.homefacts.com/city/South-Carolina/Greenwood-County/Greenwood.html>

available to transport residents to other areas. The local YMCA runs an afterschool program at the community center directly across the street from the Greenwood Housing Authority Section 8 Apartment Complex. Program director Jonathan Bass stated that if the gym needs to be used for anything else, the only place for the children to play in the area is in the community center's parking lot.

#### *1.b.ii. Cumulative Environmental Issues*

Greenwood has a long history of industrial and textile manufacturing that has left an unfortunate legacy of environmental issues for the community. Homefacts identifies 19 registered polluters, 7 State superfund sites, and 79 tanks and spills.<sup>3</sup> Through the city's assessment and cleanup grants, the community identified brownfields properties in addition to the foundry include:

- Greenwood Mill 5 (6.65 acres) – approximately 100 years of textile mill activity with a Phase II ESA identifying high concentrations of PAHs exceeding residential and/or industrial US EPA Regional Screening Levels (RSLs) in nearly all soil borings; high concentrations of arsenic, cobalt, hexavalent chromium; and pentachlorophenol in groundwater.
- Tatham property (13.8 acres) – former textile mill with the presence of a cooling pond, coal trestle, likely presence of asbestos and lead based paint in structures.
- Grendel Mill (12.2 acres) – former textile mill with the potential for petroleum products contamination, herbicides, coal, PCB containing transformers, and the presence of drums and formal metal castings.
- Several abandoned gas stations.

In addition, the Southern Railroad Company property directly south of the foundry site was observed in a 2007 Phase I site assessment to contain a large section of dumped material in a low elevation woodland area, to include numerous automobile tires, discarded railroad ties, and partially buried drums of various sizes. The drums ranged from 30 to 55-gallons and were in poor or crushed condition. There was some evidence these drums may have contained solvent material. There was also a 1,000 gallon storage tank in this area. The EPA Environmental Justice Screening tool indicates the census block group containing the Former Greenwood Mills Foundry Site (450479708002) has elevated EJ Index levels of pollution relative to state and national levels as indicated in the table below.<sup>4</sup> Community residents, city planners, and local neighborhood leaders have cited a collection of associated environment issues identified during assessment activities, including elevated levels of textile manufacturing-related contamination of soil and groundwater, illegal dumping, and petroleum contamination.

**EPA Environmental Justice Index Levels**

<b>Selected Variables</b>	<b>%ile in State</b>	<b>%ile in USA</b>
EJ Index for Particulate Matter (PM 2.5)	97	93
EJ Index for Ozone	97	92
EJ Index for NATA Diesel PM	88	80
EJ Index for NATA Air Toxics Cancer Risk	97	93
EJ Index for NATA Respiratory Hazard Index	93	87
EJ Index for Traffic Proximity and Volume	90	75
EJ Index for Lead Paint Indicator	98	93
EJ Index for Superfund Proximity	86	79
EJ Index for RMP Proximity	96	90
EJ Index for Hazardous Waste Proximity	78	73
EJ Index for Wastewater Discharge Indicator	96	95

<sup>3</sup> Source: <https://www.homefacts.com/city/South-Carolina/Greenwood-County/Greenwood.html>

<sup>4</sup> Source: <https://ejscreen.epa.gov>, Accessed October 2017

### *1.b.iii. Cumulative Public Health Impacts*

Community members have noted frequent trespassing at the Former Greenwood Mills Foundry Site. These individuals are at risk to exposure to known environmental contaminants. Cumulatively, Greenwood-associated mill properties have operated in the area for over 100 years. During most of this time there were no environmental regulations that governed waste management and disposal. Environmental assessments at the foundry property identified heightened levels of PAHs, PCBs, and metals. Long-term exposure to PAHs can lead to cataracts, kidney and liver damage, and jaundice, while the health effects associated with PCBs include skin irritations for adults and neurobehavioral and immunological changes in children. Long-term exposure to metals such as lead and aluminum can trigger dangerous conditions like heart disease, thyroid problems, dementia, neurological conditions, autism, infertility, and birth defects. The property and the other cumulative sources of environmental issues may be negatively impacting the health of nearby residents. Recent public health research suggests a strong collation between PAH exposure and the onset of asthma and related symptoms.<sup>5</sup> The presence of PAH contamination at the Former Greenwood Mills Foundry may be negatively impacting the community – particularly the many young children exposed to the site and for whom asthma is the “leading cause of childhood hospitalization and school absenteeism.”<sup>5</sup> Data provided by the South Carolina state government on Inpatient Hospitalizations and Emergency Room Department Visits with a primary diagnosis of Asthma in 2016 for residents living in the target area’s zip code (29646) identified 29 Inpatient Hospitalizations and 276 Emergency Room Department Visits. This represents a notable increase over the county and state data when compared on a per capita basis and suggests that asthma is more of a problem for residents in the zip code 29646 area than in other nearby areas. Environmental contaminants at the brownfields properties, including PAHs in soils, may be contributing to this higher level of asthma-related incidents<sup>6</sup>. A *Community Cancer Assessment* (2010-2014) provided by South Carolina Department of Health and Environmental Control (SCDHEC) in October 2017 for zip code 29646 covering the target area in Greenwood, South Carolina found a higher level of cancer cases than expected – 791 versus 739 – and a higher number of cancer deaths than expected – 332 versus 311. The most common forms of cancer for the zip code include cancer in the lung, prostate, female breast, and colon/rectum.

### **1.c. Financial Need**

#### *1.c.i. Economic Conditions*

Greenwood is a relatively small city of under 100,000 residents. Yet the community has been attempting to address the closure of multiple mill properties resulting in a challenging set of brownfield sites while at the same time attempting to recover from the long-term loss of good-paying jobs those businesses once provided. For example, the budget for the next fiscal year has over \$300,000 in additional expenses (mandatory increases to retirement fund contributions, hospitalization insurance, maintenance contracts, debt service, etc.) but revenues are only projected to increase by \$175,000 – leaving a shortfall of \$125,000. The city is limited in how much it can increase the tax millage by state law and strictly limited on the passage of fees. The City is now making severe cuts in all departments to balance the budget for the coming year, freezing salary increases for staff, and cancelling “extra” projects. For the foundry site, the city has received a commitment for \$1.7 million in sales tax funds to assist with the cleanup and redevelopment of the property. A park on the south side of the City was a specifically listed project in the sales tax referendum on which the community to fund. However, the preliminary

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<sup>5</sup> Source: Karimi, P., Peters, K.O., Bidad, K. et al. Eur J Epidemiol (2015) 30: 91. <https://doi.org/10.1007/s10654-015-9988-6>

<sup>6</sup> <https://www.ncbi.nlm.nih.gov/pubmed/25600297>

cost estimate for the project identified about \$2 million as a minimal threshold for expenses needed to create the basics of a park. This leaves a critical shortfall of at least \$200,000 to complete the work. This EPA cleanup grant will fill a vital need in ensuring the project can move forward to meet this long-standing community desire and need.

#### *1.c.ii. Economic Effects of Brownfields*

The presence of brownfields in the City of Greenwood has a negative effect on the city's economic condition. As the manufacturing employment at these former industrial sites disappeared, the economic well-being of Greenwood's residents near these properties suffered. While the City of Greenwood suffers from a lower median household income (\$24,593 vs. \$45,483), per capita income (\$15,996 vs. \$24,604), high school and college graduation rates (72.1% and 20.4% vs. 85.6% and 25.8%) than the state as a whole, the conditions become acute in the communities immediately adjacent to the brownfield properties – leading to a median household income of only \$25,537, a per capita income of \$15,982, a high school graduate rate of 69.6%, and rate college-level educational attainment or higher of only 12.9% in the Target Area (Census Tract 9708). A similar disparity was recognized in a recent planning document for the Greenwood Mill community (Census Tract 9704, Block Group 1). Using 2010 US Census Data, the document cited a per capita income of only \$9,662 compared to \$21,728 for the County (less than half) and an elderly population of 28.0% compared to 15.9% for the County. Additionally, the presence of a significant number of brownfields in the area provide a drag on economic development and business recruitment efforts. The site is also bordered on one side by Greenwood's Main Street – a main thoroughfare through the city with access to the downtown district. This prominent location for a large and notable brownfields property represents a challenge for economic development. Though the buildings have now been removed, the unimproved land and evidence of illegal dumping both on and near the property make it an eyesore for both local residents, businesses, and economic developers attempting to recruit new commercial enterprise to locate within the city. The City Manager, Charlie Barrineau, stated in the community meeting for this grant application that one of the first priorities after cleanup was to create an attractive, welcoming entrance with signage on the corner of Main St and Foundry Rd. Cleaning up these sites will remove blight and better showcase the city helping future economic development.

## **2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS**

### **2.a. Project Description**

#### *2.a.i. Existing Conditions*

All buildings and equipment from the Former Greenwood Mill Foundry Site have been removed. The 16.6-acre property consists of woodland areas and weedy fields. However, foundry wastes (i.e. black sand/silt) have been found in surface and subsurface soils across portions of the property. Samples of this foundry waste taken from the site exhibited increased levels of PAHs, including benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, dibenz(a,h)anthracene, and indeno(1,2,3-cd)pyrene – often above the Site Specific Risk-Based Screening Levels (SSRBLs – established by a Risk Assessment performed for the site using funds from Greenwood's EPA Brownfields Assessment Grant) in surface and subsurface samples. Soil samples also showed heightened levels of metals such as antimony, arsenic, chromium, iron, selenium, and vanadium and PCBs (PCB-1260 and PCB-1016). In addition, environmental assessments of the site's groundwater found various metals exceeding the established EPA MCLs, including aluminum, beryllium, and lead. SCDHEC has determined that soils with foundry wastes or with impacts above the SSRBLs will require remediation and/or engineering and institutional controls. Impacts to groundwater will be managed with a restrictive covenant on the deed to prevent future groundwater use.

### *2.a.ii. Proposed Cleanup Plan*

Cardno prepared an Analysis of Brownfields Cleanup Alternatives (ABCA) for the Former Greenwood Mill Foundry Site with funding from the EPA via a Brownfields Assessment Grant awarded to the City of Greenwood. Based on this report, the City intends to implement a “Capping” solution to cover the contaminated soil areas in the northwest section of the property with an engineered cap to create sports field. This area is contiguous with a contaminated area to the northeast that will be capped with an asphalt parking lot later as a part of the park development paid for with leveraged sales tax dollars. The city’s selected contractor will remove the area’s vegetative cover and place 2 feet of clean, low-permeability soils (i.e. 18” of packed clay and 6” of topsoil) to protect future users from direct contact with foundry wastes and contaminated soils. The cap will extend approximately 10% beyond the known boundaries of the areas of contamination. Specially-designed planting beds will be constructed for aesthetic reasons and include trees and flower beds. These beds will be designed to a minimum depth of 5 feet under the trees so as to maintain a 2 foot clean soil buffer beneath the root ball when planting (typically 3 feet deep) and 3 feet under bushes and other shallowly planted vegetation. Areas of concern in the site’s southeastern section will be addressed by allowing vegetative regrowth with access restrictions and boardwalks to limit potential exposure in the more wooded areas of the future park.

### *2.a.iii. Alignment with Revitalization Plans*

The Greenwood City/County Planning Department recently published the *Greenwood City/County Comprehensive Plan 2035*. Redevelopment of the Former Greenwood Mills Foundry Site supports the plan’s goals for preserving open space and parks and protecting the environment within the Natural Resources element of the plan. By removing blight and beautifying Greenwood’s Main Street Corridor, the project will also support the plan’s Economic element, including its goals to recruit new businesses and redeveloping target industrial areas. The project will encourage healthy lifestyles by providing access to recreational facilities and revitalizing nearby historic neighborhoods in support the plan’s Housing and Land Use elements. Finally, the development of recreational facilities, parks, and educational opportunities cited in the Community Facilities element are supported by this project. Altogether, the proposed cleanup project and park development fits squarely with Greenwood’s long-term plans for revitalizing its neighborhoods, promoting economic growth, and protecting the environment. In a July 2013 community meeting, neighborhood leaders from many south Greenwood neighborhoods rallied to pursue the park development plan, led by three of the Brownfield Assessment Grant Committee members – Natalie Parramore (Greater Greenwood Parks & Trails), John Lamb (Greenwood Housing Authority), and Anne Gunby (Wisewood Homeowners group). These organizations are still community partners for this grant opportunity. Redevelopment of the foundry site and the establishment of the park will fulfill a long-standing community desire that was clearly expressed when more than 50 people attended a south side park visioning session on October 27, 2014 and a follow-up meeting to review park designs on a January 20, 2015.

## **2.b. Task Descriptions and Budget Table**

### *2.b.i. Task Descriptions*

Grant funds will be used for Community Outreach, Cleanup Planning and Site Cleanup. Overall grant programmatic support will be provided by City of Greenwood as an in-kind contribution and a part of its match. All cost estimates are based on similar expenses incurred by the City’s EPA cleanup grant for the Greenwood Mill site.

Task 1 – Project Management: The City of Greenwood will track project tasks, schedule and budget; oversee the work of the selected brownfields cleanup contractor; and report on project

activities and accomplishments to stakeholders. The project manager will also attend relevant meetings, workshops, and conferences sponsored by the EPA and/or SCDHEC. The anticipated level of effort required will be 100 hours of the project manager's time amounting to \$5,000 in cost (\$50/hour X 100 hours = \$5,000) and \$2,500 for travel to attend the training meetings and conferences. The work will be accomplished by the City's Project Manager and support staff. Outputs will include 12 Quarterly Reports, three annual Disadvantage Business Enterprise Utilization reports, three Financial Status Reports, and ACRES data entry.

**Task 2 – Community Outreach:** The City of Greenwood will work closely with partner organizations such as the John Lamb Community Center (adjacent to the property), the Greenwood Housing Authority, and Greenwood Parks & Trails Foundation to plan and conduct a series of stakeholder meetings for this grant effort. The city will also distribute vital project information through local newspapers, radio and television media, postcards, and social networking platforms. The \$15,000 budget for the contractor performing the activities includes:

- Developing a Community Involvement Plan (CIP) (\$2,500)
- Facilitating 3-4 press events and public meetings to discuss project activities and cleanup results, specifically including a community meeting prior to cleanup start and after cleanup completion so that the community will be well-informed as to what will occur on the site during cleanup, truck routes, etc. as well as the final results of the cleanup (\$8,500)
- Preparing and distributing project flyers, posters, video clips, and public notices (\$4,000)

In addition, City of Greenwood will spend \$500 on printing costs to publish the flyers and posters and contribute 40 hours of Project Manager time to participate in and help coordinate the community meetings (\$50/hour X 40 hours = \$2,000). Total cost for Task 2 – Community Outreach is \$17,500, and the work will be accomplished by subcontractors in conjunction with the city's Project Manager. Outputs will include one CIP, three to four community stakeholder meetings, and 500 project brochures, 250 postcards, and four public notices.

**Task 3 – Cleanup Planning:** Cleanup planning will include finalizing the ABCA document to include obtaining review and approval from EPA and SCDHEC Project Managers, placing the ABCA on a 30-day public review and comment period, preparing the Quality Assurance Project Plan (QAPP) for confirmation soil sampling, and negotiating and receiving the necessary regulatory approvals. Cleanup planning contractor costs are anticipated to include the following:

- Finalization of ABCA document, including incorporation of comments from public notice and regulatory review (\$4,000).
- Preparation of a QAPP and Health and Safety Plan (HASP) (\$5,500).
- Development of bid documents (RFP) for site cleanup activities, evaluation of bids, calling references, coordination of a pre-bid onsite meeting and selection of sub-contractors (\$9,500).

The City of Greenwood will also contribute 20 hours of Project Manager time to review documents (\$50/hour X 20 hours = \$1,000). Total cost for Task 3 – Cleanup Planning is \$20,000, and the work will be accomplished by contractors in conjunction with oversight from the city's Project Manager. Outputs will include one ABCA, one QAPP, one HASP, and bid documents for the capping activities.

**Task 4 – Site Cleanup:** The City of Greenwood will use the majority of the grant funds for the actual site cleanup activities. Based on the Phase II ESAs of the property and the findings from the draft ABCA, subcontractor cleanup activities are estimated to be \$192,400 and include the following remedial activities:

- Mobilization/Demobilization (\$1,500)
- Construction entrance (\$2,500)
- Clear-cut 3 acres of new growth forest and install 300' access road (\$21,600 @ \$72/LF)

- Emplace 334 truckloads clay and 112 truckloads topsoil (\$89,300 @ \$150/truckload X 334 [clay] and \$350/truckload X 112 [topsoil])
- Grind and hydroseed 3 acres (\$13,500 @ \$2,000/acre and \$2,500/acre, respectively)
- Install 10 soil buffer planting beds (\$12,000 @ \$1,200/each)
- Anticipated 13 days for construction (\$52,000 at \$4,000 X 13 days X 1 crew)

The City will also contribute 52 hours of Project Manager time to review documents, interface with subcontractor personnel performing the work and monitor progress (\$50/hour X 52 hours = \$2,600). Total cost for Task 4 – Site Cleanup is \$195,000, and the work will be accomplished by subcontractors with oversight from the city's Project Manager. Outputs will include one final Cleanup Report and a Certificate of Completion letter.

#### 2.b.ii. Budget Table

In summary, the total cost of project activities is estimated to be \$240,000. The City of Greenwood is requesting \$200,000 in cleanup funds from the EPA and will contribute the 20 percent match funding (\$40,000) in a mixture of in-kind contributions (212 hours of Project Manager time = \$10,600) and cash (\$29,400).

**Greenwood Foundry Proposed Cleanup Project Budget**

Budget Categories (programmatic costs only)	Project Tasks				Total
	Task 1: PM	Task 2: Outreach	Task 3: Planning	Task 4: Cleanup	
Personnel	\$5,000	\$2,000	\$1,000	\$2,600	\$10,600
Fringe Benefits					
Travel	\$2,500				\$2,500
Equipment					
Supplies		\$500			\$500
Contractual		\$15,000	\$19,000	\$192,400	\$226,400
Other (specify)					
<b>Total</b>	<b>\$7,500</b>	<b>\$17,500</b>	<b>\$20,000</b>	<b>\$195,000</b>	<b>\$240,000</b>
EPA Share	\$2,500	\$2,500	\$15,000	\$180,000	\$200,000
Greenwood Share	\$5,000	\$15,000	\$5,000	\$15,000	\$40,000

#### 2.c. Ability to Leverage

The attached letter from Greenwood County confirms that \$1,757,479.45 will be available from the revenues of the Greenwood County Capital Projects Sales Tax, which was approved by voters in a 2016 referendum. The park was one of the specific capital projects included on the referendum. Around \$1 million will be available around the end of 2018 with the balance available in 2024. The funds available at the end of 2018 will be leveraged to complete the cleanup activities at the site and begin park construction. In order fulfill the entire community vision for the park, the City seeks to leverage other grant funds and volunteer efforts.

The City of Greenwood has a demonstrated ability to leverage grant funds. The city has already provided \$50,000 to the Greenwood Housing Authority for the demolition of the 4 buildings on the foundry property back in 2006. In addition, the city has developed strong relationships with the Greenwood Parks & Trails Foundation and the Self Family Foundation for the redevelopment of brownfields properties in the area. The city has a history of developing parks leveraging community-wide support. Both our West Cambridge and Grace Street parks were created in large part through private donations and volunteer hours from members of the community. These projects demonstrate the community's commitment to work together to create community parks in the city.

- The land for the **West Cambridge** park was purchased by the City for \$60,000 from CSX and then donated to Greenwood County. The Greenwood Parks Foundation secured private

financial donations (\$400,000) and in-kind labor/equipment (\$150,000-\$200,000) to construct the park. The City provides annual maintenance and utilities for the park. The park opened in 2004.

- The **Grace Street** property was donated to the City by Greenwood CPW in 2016. The City leased the land for \$1 to the Greenwood Parks Foundation. The foundation has used private funds to develop a dog park, walking trail around the park's lake, pavilion and natural playground, restrooms, and sensory garden. Over \$2 million in Capital Project Sales Tax funding has been allocated for additional improvements, and a volunteer team maintains the park day-to-day.

The City of Greenwood leveraged a previous 2012 EPA Community-wide Hazardous and Petroleum Brownfields Assessment Grant to secure an additional \$1.7 million in leveraged dollars from Community Development Block Grant (CDBG) funds, SCDHEC's Brownfields Revolving Loan Fund (BCRLF), the City's General Fund, and contributions from the Self Family Foundation, the Palmetto Trust, Greenwood County in waiver of disposal fees, and the Greenwood Commissioners of Public Works for water. This funding enabled the City to clear the Greenwood Mill 5 site of all debris, remove the unstable smoke stack and elevator shaft as well as thoroughly assess the site. The city is also working closely with local nonprofit organizations such as the John G. Lamb Community Enrichment Center and Community Initiatives, Inc. Both organizations have expressed interest in coordinating volunteer projects to assist with park development, community education, and greenspace maintenance.

Source	Purpose/Role	Amount (\$)	Status
Sales Tax Funds	Park development (Paving, Playground Equipment, Facility Construction, Trail Development, etc.)	\$1,700,000	Secured resource <i>documentation attached</i>
BCRLF	Support of additional cleanup activities at the site / matching funds.	\$50,000	Potential resource
Greenwood Parks Foundation – <i>private contributions and volunteers</i>	Plantings, Facility Construction, Trail Development, etc.	\$200,000	Potential resource
The Self Foundation	Park Development (Playground Equipment and Installation, Facility Construction)	\$100,000	Potential resource

### 3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

#### 3.a. Engaging the Community

The City of Greenwood will involve the community in the Target Area in this cleanup project with the assistance of our local partners such as the John G. Lamb Community Enrichment Center and Community Initiatives, Inc., The city will coordinate with these organizations and others to disseminate project information and accomplishments, organize and hold community meetings, and set up community volunteer projects associated with park development. In addition, the city will create a volunteer planning team for the park to help coordinate community planning through the cleanup grant and into park development, plantings, park maintenance, etc. Similar efforts have produced volunteer-led teams to maintain local parks in other areas of the city. The City of Greenwood will develop a Community Involvement Plan to guide outreach activities during the project. Those activities will include a pre-cleanup public meeting with community members from the target area and stakeholders to discuss the project initiative and upcoming activities. Participants will be able to provide comments on the anticipated efforts and their implementation. Activities will also include a review of the ABCA plans and recommendations, hours of operation, truck routes, site signage, and other safety

measures being put in place to protect the area's sensitive young population. The meeting will allow the project team to seek out and address the concerns of local residents regarding health, safety, and community disruption from the project. The city will also hold a post-cleanup meeting to describe the work that was completed and solicit feedback on next steps for redeveloping the property.

Communication will be facilitated through notices in local media including the *Index-Journal* (local newspaper) which has already published one article about this potential brownfields cleanup project; WNEH (a local PBS TV channel); and local radio stations WZSN, WHZK-LP, WCZZ, and WCRS. The City will also post notices on its social media platforms to primarily engage the youth population in the Target Area, including its own website, Facebook and Twitter feed. Video updates will be posted to YouTube and linked to the social media platforms. In addition, project posters and flyers will be posted at community partner and nearby public housing information boards. The City of Greenwood is a relatively small community, and the city has been implementing brownfields-related projects in the area for more than a decade. During this time we have developed strong communication networks and community partnerships, and these methods have proven to be the best way to reach the target area.

The two community meetings held to discuss the park vision attracted over 73 community members – nearly reaching the space capacity for the meeting facilities. Participants identified their preferences for the park and selected from three possible designs. The *Index-Journal* published an article entitled *Planned Foundry Road Park Embraced by South Side Residents* on the recent community meeting held October 24, 2017 to discuss this EPA Brownfields grant application. Four young children from the neighborhood attended this community meeting to express their desire to have a park near where they live. It is anticipated that the high level of community interest in the park project combined with our broad-based community organization network within the nearby neighborhoods will enable us to effectively disseminate critical project information such as project meeting notices and activity status updates. Specific emphasis will be placed on reaching the lower-income residential areas and sensitive young populations located near the property. Educational activities about the site redevelopment, importance of avoiding contaminated and construction site areas, and eventual park development will be held for neighborhood children at partner sites such as the Community Initiatives, Inc., YMCA, and John G. Lamb Community Enrichment Center. Children and teens will also be provided with information on planned volunteer opportunities associated with the development and maintenance of areas of the park, including a neighborhood garden. The City of Greenwood also intends to issue two press releases. These press releases will contain information the project's background and history as well as environmental issues and cleanup activities. Project announcements will be distributed through all these formal and informational channels as major milestones are achieved. This will include, but not be limited to, grant award and project startup, pre-cleanup stakeholder meeting and the post-cleanup stakeholder meeting.

### **3.b. Partnerships with Government Agencies**

The City of Greenwood has entered into a Voluntary Cleanup Contract for the Former Greenwood Mill Foundry Site with the South Carolina Department of Health and Environmental Control (SCDHEC) – the state agency responsible for environmental issues. The SCDHEC letter is included with the Cover Letter for this application. The city will continue to report on the status of the project to SCDHEC as required by that contract, and the agency will provide regulatory oversight and serve as a technical resource for the project team during the implementation of the cleanup activities. Under the contract, SCDHEC sets the cleanup standards and issues the Certificate of Completion once the terms of the contract are satisfied. The SCDHEC Upstate Public Health Regional Office has also provided a letter of support for the

grant application. SCDHEC will provide statistics and data for the project and work with the project team to build partnerships and access new resources to support this project.

As the funding agency, the Environmental Protection Agency (EPA) will have significant involvement in the project. Greenwood will work with EPA Region 4's Project Officer to ensure all work is completed in accordance with the terms and conditions of the grant and that the Work Plan is met in a timely manner.

Greenwood County – Confirms funding dedicated to the project from the voter-approved 2016 Greenwood County Capital Projects Sales Tax. Further, Greenwood County commits to working with the City to bring the site into its program/activity efforts to give youth residing in the area the opportunity to play in an organized and adult supervised youth program.

### **3.c. Partnerships with Community Organizations**

#### **3.c.i. Community Organization Descriptions & Roles**

The City of Greenwood will collaborate with the following community organizations for this project.

- Greater Greenwood Parks & Trails Foundation – Volunteer organization working to advance the parks movement in Greenwood. They are willing to conduct public hearings, provide members to serve on public advisory boards, and find ways to seek funding for future development.
- The Greenwood Housing Authority – Donated the property to the City after the City entered into a VCC with DHEC. It has shared the vision of a park at the Foundry site for over a decade. Will provide a staff member to serve on the planning committee to include the community engagement efforts needed to ensure a collective vision for the park. Will use the park for programming for the over 315 residents that live adjacent to the site. Has a partnership with the YMCA to provide services to the residents to improve quality of life, particularly with regard to healthy lifestyles. Park will provide space for the children who currently run back and forth across the street to play. Park's development will also encourage a more mixed income community, strengthening the neighborhood.
- Community Initiatives, Inc. – Community Initiatives, Inc. is a community-based nonprofit organization located in the Matthews Neighborhood offering social, economic, educational, and health services for area individuals and families. Located one block away from the future park property. Will serve on the planning committee to ensure community engagement efforts needed for a collective vision for the park.
- Mathews Mill Village Neighborhood Association – Neighborhood is directly across the street from the Foundry site; will provide citizens to serve on committee and assist in design and development of the park.
- Callie Self Memorial Baptist Church – A community church located half a mile from the site; will host community meetings and appoint a member for planning committee.
- Greenwood YMCA – Provides High Hopes Tutorial After School Program at the Greenwood Housing Authority's John Lamb Community Center (Community Center) adjacent to the Foundry site; serves 40 school age children with a warm meal and programming to build character strength, skills, and relationships that lead to positive behaviors, better life, smart health choices, and pursuit of higher education. The only outdoor facility that can be used currently is the parking lot; will serve on the planning committee and assist in community engagement work.
- Wisewood Neighborhood Association – Represents 75 homes in south Greenwood; neighborhood is 1 mile from Foundry site; will provide citizens to serve on planning committee and assist in the design and development of the future park and greenspace.

- Self Family Foundation – Currently supports the YMCA’s High Hopes After School Program held at the Community Center; has provided \$82,752 to this program to date; would be receptive to a request for financial support in the purchase of playground equipment for the park.

*3.c.ii. Letters of Commitment*

Letters of commitment for each of the organizations identified in Section 3.c.i are included as an attachment to this proposal. No subawards will be made to community organizations.

**3.d. Partnerships with Workforce Development Programs**

There are no current EPA Brownfields Job Training grantees in South Carolina. However, Rusty Denning, VP at Piedmont Technical College states that they regularly offer HAZWOPER training and offer asbestos survey, inspector, and abatement training, when there is a need. The City will connect potential employers with the school to assist with their staffing needs. In addition, the City’s consultant is committed to offering subcontracting opportunities to and/or procurement of product/services from local firms and individuals, when feasible.

**4. PROJECT BENEFITS**

**4.a. Welfare, Environmental, and Public Health Benefits**

Restoring this 16.6-acre property to a useful community function as a neighborhood park will protect the community from harmful environmental contamination associated with its former foundry operations and prohibit ongoing illegal dumping. It will also provide the community with a vital greenspace – the only park south of the City’s center. Cleanup of the sources of contamination at the site will prevent further harm to the environment, including a small wetlands area. Located near lower-income housing with a significantly increased population of young children, this project will also help protect Greenwood’s future generations and provide them with healthy recreational alternatives. The table below identifies the anticipated benefits from this grant and broader project by area.

**Anticipated Welfare, Environmental and Public Health Benefits**

Area	Anticipated Benefit	Community Need Addressed
Welfare	Removal of blight along entryway to city	Expanded economic opportunity
	Enhanced park greenspace	Increased recreational opportunities
Environmental	Removing sources of contamination	Protect wildlife and wetlands area
Public Health	Prevent exposures to contamination Mitigate contamination migration	Protect citizens, particularly neighborhood children, from hazardous sources of contamination

**4.b. Economic and Community Benefits**

Cleaning up and creating a park at the Former Greenwood Mill Foundry Site will remove blight along one of City of Greenwood’s major entryways along Main Street and will provide economic benefits by aiding City and County economic developers with their efforts to recruit new businesses. Plus, the removal of the blight impacting neighboring properties will increase property values and the tax base. In 2009, The Trust for Public Land published, “Measuring the Economic Value of a City Park System”, which estimated that property values near parks increase between 5% and 15%. The report also found parks encourage increased exercise in a community, and exercise saves \$500 in health costs yearly for individuals 65 years and older and a \$250 savings for those under 65. For the target area (pop. 9,429 with 12.5% over 65), the resulting savings will potentially be more than \$2.65 million per year. The new park will also provide non-economic community benefits by creating vital recreational areas within walking distance for the children of the city’s southern residents. The park will enhance the YMCA’s High Hopes After School Program held at the Community Center adjacent to the site and allow

these 40 children in addition to the many neighborhood children to have a place to play other than in a parking lot.

## **5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

### **5.a. Audit Findings**

Our most recent Financial Audit was completed on March 24, 2017, by McKinley, Cooper, & Co, LLC. There were NO adverse audit findings.

### **5.b. Programmatic Capability**

Greenwood has the requisite capacity to administer the EPA grant funds based on previous experience in federal and state grant management. Ms. Steffanie Dorn, Finance Director for Greenwood, has served as the Brownfields Project Director and managed the grant for Greenwood's Brownfields Assessment Grant that began October 1, 2012 and ended September 30, 2015. She currently serves as the Brownfields Project Director for a Cleanup Grant for the Greenwood Mill 5 site that began October 1, 2015. She has served as the Finance Director for the City for nineteen years, managing federal and state funds for the entire time. She will continue in this capacity for the cleanup grant. Mr. Charlie Barrineau, City Manager, will support Ms. Dorn. He served as the Assistant City Manager for nine years and has been the City Manager for an additional eight years. Mr. Barrineau and Ms. Dorn typically manage two to three grants a year, thus they have managed at least 30 grants during their tenure with the City. These grants have included projects in law enforcement, fire, community development, economic development, and brownfields. The procurement process for a professional brownfields consultant will be completed no later than two months after grant announcements in full compliance with state and new federal guidelines, 2 C.F.R. 200 and EPA's rule at 2 C.F.R. 1500. Therefore, the City will be prepared to begin work upon grant award. Upon the SCDHEC approval of the final ABCA, remediation contractors will be procured through a Request for Proposals (RFP) in accordance with the federal guidelines. All procurements will be advertised in South Carolina Business Opportunities, the twice-weekly publication for proposed procurements that all state agencies must use and other governmental entities can voluntarily use.

### **5.c. Measuring Environmental Results: Anticipated Outputs/Outcomes**

Many of the project's anticipated benefits – such as increased economic opportunity through the removal of blight, expansion of recreational opportunities, and creation of greenspace – will be hard to measure quantitatively during the lifecycle of the cleanup project. However, the following key performance measures and outcomes will be tracked to gauge the results of this project.

- Number of acres of contaminated soil capped.
- Number of acres made ready for reuse as park facilities.
- Number of participants involved in community meetings and planning activities as documented on meeting sign-in sheets.
- Additional funding raised and leveraged for construction of park facilities, parking, playground equipment, trail development, and other components.

All performance measures will be reported in the quarterly reports and the online ACRES database.

### **5.d. Past Performance and Accomplishments**

#### **5.d.i. Prior EPA Brownfields Assistance Grants**

The City of Greenwood has previously received a \$300,000 US EPA Community-wide Hazardous (\$200,000) and Petroleum (\$100,000) Brownfield Assessment Grant and \$200,000 US EPA Brownfields Clean Grant for the Greenwood Mill 5 property.

# Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☒ Preapplication  
☐ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

**\* 3. Date Received:**

11/15/2017

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

City of Greenwood, South Carolina

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

57-6000237

**\* c. Organizational DUNS:**

0779958680000

**d. Address:**

**\* Street1:**

PO Box 40

**Street2:**

**\* City:**

Greenwood

**County/Parish:**

**\* State:**

SC: South Carolina

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

296480040

**e. Organizational Unit:**

**Department Name:**

**Division Name:**

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

Ms.

**\* First Name:**

Steffanie

**Middle Name:**

C

**\* Last Name:**

Dorn

**Suffix:**

**Title:**

Finance Director

**Organizational Affiliation:**

**\* Telephone Number:**

864-942-8416

**Fax Number:**

864-942-8469

**\* Email:**

steffanie.dorn@gwdcity.com

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

### Type of Applicant 2: Select Applicant Type:

### Type of Applicant 3: Select Applicant Type:

### \* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

### CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-17-09

### \* Title:

FY18 GUIDELINES FOR BROWNFIELDS CLEANUP GRANTS

### 13. Competition Identification Number:

### Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Brownfields Cleanup - Greenwood Foundry

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

## Application for Federal Assistance SF-424

### 16. Congressional Districts Of:

\* a. Applicant

\* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

### 17. Proposed Project:

\* a. Start Date:

\* b. End Date:

### 18. Estimated Funding (\$):

* a. Federal	<input type="text" value="200,000.00"/>
* b. Applicant	<input type="text" value="40,000.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="240,000.00"/>

### \* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

- ☐ a. This application was made available to the State under the Executive Order 12372 Process for review on
- ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- ☒ c. Program is not covered by E.O. 12372.

### \* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

### Authorized Representative:

Prefix:  \* First Name:

Middle Name:

\* Last Name:

Suffix:

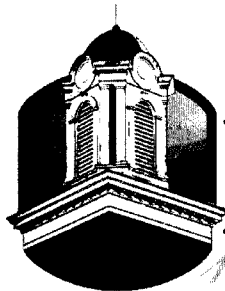
\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:





City of  
**Pickens**

*Where the Mountains Begin*

219 PENDLETON STREET

P. O. BOX 217

PICKENS, SC 29671

[www.cityofpickens.com](http://www.cityofpickens.com)

R04-18-A-078

November 16, 2017

Atlanta Federal Center  
61 Forsyth Street, S.W. 10<sup>th</sup> FL  
Atlanta, GA 30303-8960

Attn: Ms. Barbara Alfano

Re: Proposal for Community-wide Brownfield Assessment Grant  
Hazardous Substance and Petroleum  
City of Pickens, SC

Dear Ms. Alfano,

The City of Pickens is pleased to present this Proposal for Community Brownfield Assessment grant funding for hazardous substance and petroleum Brownfield properties within our community. Receiving the Assessment Grant will be beneficial to our downtown revitalization initiative as well as our larger community.

The community has abandoned/underutilized properties with potential environmental issues and with the assistance of this grant, we look forward to laying the foundation for helping make some of these properties more safe and beneficial to the community.

Below is the applicant identification information for our proposal.

If you have any questions, please feel free to contact me.

Sincerely,

Bruce Evilsizor  
City Administrator

**EPA Community-Wide Brownfield Assessment Grant  
Applicant Identification Information  
November 16, 2017**

- A. Applicant Identification:** City of Pickens  
219 Pendleton Street  
PO Box 217  
Pickens, SC 29671
- B. Funding Requested:**  
i) Grant Type: Assessment  
ii) Assessment Grant Type: Community-wide  
iii) Federal Funds Requested: \$300,000  
iv) Contamination: Hazardous Substances (\$200,000) and Petroleum (\$100,000)
- C. Location:** City of Pickens, Pickens County, South Carolina
- D. Property Information:** Not Applicable
- E. Contacts:**
- |                                |                                       |
|--------------------------------|---------------------------------------|
| i) Project Director:           | ii) Highest Ranking Elected Official: |
| Bruce Evilsizor                | Mayor David Owens                     |
| Administrator, City of Pickens | City of Pickens                       |
| 219 Pendleton Street           | 219 Pendleton Street                  |
| Pickens, SC 29671              | Pickens, SC 29671                     |
| Phone: 864-898-8160            | Phone: 864-878-6421                   |
| bevilsizor@pickenscity.com     | dowens@pickenscity.com                |
- F. Population:** i) General Population: City of Pickens – 3,148  
ii) Not Applicable  
iii) Pickens is not located within a county experiencing persistent poverty.
- G. Regional Priorities Form/Other Factors Checklist:** Attached
- H. Letter from State or Tribal Environmental Authority:** Attached

## Regional Priorities Form/Other Factors Checklist

Name of Applicant: City of Pickens, SC

### Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s):

Assistance to Communities That Have Limited In-House Capacity to Manage Brownfield Projects

Page Number(s): pg 11-12

### Assessment Other Factors Checklist

Please identify (with an **X**) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

	Other Factor	Page #
	<i>None of the Other Factors are applicable.</i>	
<b>x</b>	Community population is 10,000 or less.	pg 1
	The jurisdiction is located within, or includes, a county experiencing "persistent poverty" where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
	Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
	Target brownfield sites are impacted by mine-scarred land.	
<b>x</b>	Project is primarily focusing on Phase II assessments.	pg 9
<b>x</b>	Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	pg 10 Appendix B
	Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	

## **1. COMMUNITY NEED**

### **a. Target Area and Brownfields**

**i. Community and Target Area Descriptions:** Pickens is a small, rural Appalachian city with a population of 3,148 (2011-2015 ACS). Situated at the foot of the Blue Ridge Mountains, Pickens, the county seat of Pickens County, is approximately 20 miles west of Greenville, SC, 70 miles south of Asheville, NC, and 143 miles northeast of Atlanta, GA. Through 1940, the local economy was based almost entirely on the cotton industry. By the 1970s, a structural shift had taken hold as manufacturing became the dominate means of income. At its height, the manufacturing industry employed 15,000 Pickens County residents; however, many of these plants were textile-based and relocated overseas in following decades. Manufacturing was significant to the local economy; however, its role today is minimal but its loss dramatic. This decline resulted in the abandonment of manufacturing facilities and two rail lines, leaving behind abundant brownfield sites. One of the rail lines has been repurposed into the Doodle Trail, a bright spot for the City. This 8.7 mile rails-to-trails project connects Pickens with Easley, SC. The associated former rail depot and future Doodle Park are the focus of the City's ongoing Brownfields Cleanup Grant and an example of the City's efforts to reclaim its sense of place and revitalize the community.

In an attempt to rejuvenate the community, Pickens has undertaken a **Downtown Revitalization Initiative** which started in 2010. This initiative targets **Downtown Pickens** and includes the **Main Street Corridor**, the **Doodle Trail Corridor**, and the **Griffin Ebenezer Neighborhood**. The target area lies primarily in census tract 104.02, which is a **distressed census tract**. The Griffin Ebenezer neighborhood (Census Tract Block Group 104.02 BG 5), located south of Main Street, encompasses nearly all of the residential properties in the target area.

The history of the Griffin Ebenezer neighborhood is about as old as the incorporated City itself. After being left destitute by the American Civil War, the land which is now Pickens became incorporated in 1868 when Elihu Griffin donated 40 acres for a Courthouse just north of the neighborhood on what became Main Street. In 1871, newly emancipated African Americans established Griffin-Ebenezer Baptist Church in the community. The history of this church is, in essence, the history of this neighborhood because it was the most notable development for residents south of Main Street. In a neighborhood that is still predominantly African-American (30.8% - ACS), the church continues to be its most central meeting place.

### **ii. Demographic Information and Indicators of Need**

	<b>Griffin Ebenezer Neighborhood</b>	<b>Census Tract 0104.02</b>	<b>Pickens City</b>	<b>Pickens County</b>	<b>South Carolina</b>	<b>National</b>
Population	561 <sup>1</sup>	5,189 <sup>1</sup>	3,148 <sup>1</sup>	120,124 <sup>1</sup>	4,777,576 <sup>1</sup>	316,515,021 <sup>1</sup>
Unemployment	48.6% <sup>1</sup>	12.1% <sup>1</sup>	19.6% <sup>1</sup>	9.2% <sup>1</sup>	9.5% <sup>1</sup>	8.3% <sup>1</sup>
Poverty Rate	36% <sup>1</sup>	19.4% <sup>1</sup>	28.1% <sup>1</sup>	20.0% <sup>1</sup>	17.9% <sup>1</sup>	15.5% <sup>1</sup>
Minority	32% <sup>1</sup>	6.0% <sup>1</sup>	14.2% <sup>1</sup>	13.5% <sup>1</sup>	36.2% <sup>1</sup>	37.8% <sup>1</sup>
Median HH Income	\$28,617 <sup>1</sup>	\$41,010 <sup>1</sup>	\$33,250 <sup>1</sup>	\$41,459 <sup>1</sup>	\$45,483 <sup>1</sup>	\$53,889 <sup>1</sup>
African-American	30.8% <sup>1</sup>	5.8% <sup>1</sup>	14% <sup>1</sup>	6.6% <sup>1</sup>	27.3% <sup>1</sup>	12.3% <sup>1</sup>
Public Assistance/SNAP	39.8% <sup>1</sup>	19.9% <sup>1</sup>	30.1% <sup>1</sup>	11.8% <sup>1</sup>	15.1% <sup>1</sup>	13.2% <sup>1</sup>
Not in Labor Force	48.2% <sup>1</sup>	42.0% <sup>1</sup>	48.3% <sup>1</sup>	43.5% <sup>1</sup>	39.1% <sup>1</sup>	36.3% <sup>1</sup>
Per Capita Income	\$13,212 <sup>1</sup>	\$20,301 <sup>1</sup>	\$16,869 <sup>1</sup>	\$21,222 <sup>1</sup>	\$24,604 <sup>1</sup>	\$28,930 <sup>1</sup>
No H.S. Diploma 25+	42.4% <sup>1</sup>	21.1% <sup>1</sup>	32.1% <sup>1</sup>	16.2% <sup>1</sup>	14.4% <sup>1</sup>	13.3% <sup>1</sup>
No Vehicle Available	22.5% <sup>1</sup>	3.4% <sup>1</sup>	5.5% <sup>1</sup>	2.0% <sup>1</sup>	2.5% <sup>1</sup>	4.5% <sup>1</sup>

<sup>1</sup>Data are from the 2011-2015 American Community Survey 5-Year Estimates available on American FactFinder at [https://factfinder.census.gov/faces/nav/jsf/pages/community\\_facts.xhtml](https://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml). (ACS)

Even in a rural area of the country with a comparatively high unemployment rate, the target area does not compare favorably in its financial condition. Blight, high poverty levels, astonishingly high unemployment, and aging, dilapidated structures plague an area that will continue to waste away if significant community investments are not made to stem the decline.

**iii. Description of the Brownfields:** A community with a manufacturing and railroad history dating back more than 115 years has no shortage of brownfields issues. In addition to the Rail Depot Brownfields site, a preliminary site inventory consisting of an environmental database and historical records review, visual assessment, and, most importantly, community input has identified 18 potential sites in or adjacent to the target area. These sites include a former textile manufacturing facility with over 110 years of manufacturing history, a former automotive dealership and service center, a former industrial warehouse, at least six former service stations/filling stations, and numerous vacant or underutilized commercial and industrial sites. It is anticipated that continued efforts will result in the identification of additional sites.

These sites, located in or adjacent to the target area, pose risks to community health and the environment and contribute to increased blight in the target area. The brownfields located in the target area greatly impair the City's redevelopment efforts by deterring developers who are more inclined to invest in properties elsewhere rather than address the environmental stigma. In addition to economic impacts, these vacant, dilapidated structures are perceived as unsafe and unsecure, thus discouraging community usage of outdoor recreational areas which are adjacent to many of the already identified Brownfields sites. Potential Brownfields sites include:

**Former Auto Dealership/Service Center:** This vacant automotive dealership and service center encompasses over four acres and is located less than 1/3 mile from Main Street. Automotive sales and service activities have occurred on site dating back to the 1950s. Redevelopment plans for the site include commercial or light industrial operations which are currently impaired by the perception of environmental impacts associated with the site's operational history. Contaminants typically associated with this type of site include petroleum products, volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and lead and other heavy metals. The property owner has granted site access.

**Former Pickens Cotton Mill:** This 14.2-acres site is located along the Doodle Trail Corridor portion of the target area and approximately 0.4-miles from the Doodle Park site. The site was home to textile manufacturing operations from 1906 until operations ceased in 2002. The facility specialized in the manufacture of Class C Sheeting used in the industrial trade for bagging, friction tapes, and waterproofing. Much of the once 3-story manufacturing facility has been demolished; however, a portion of the site is being used for pallet recycling. This site is directly adjacent to many residential properties and the Doodle Trail runs along its southern property boundary, creating a safety risk to local residents and visitors to the trail. Common contaminants of concern associated with this type of property include petroleum products, VOCs including solvents, SVOCs, PAHs, polychlorinated biphenyls (PCBs), mercury, chromium and other heavy metals. Redevelopment plans for the site include the expansion of Doodle Trail amenities and development of retail space and outdoor recreation facilities along the Doodle Trail Corridor. Redevelopment of this site is considered crucial to the City's Downtown Revitalization Initiative by not only creating a welcoming and positive image for those entering the Downtown area, but also by bringing much needed jobs to the residents of the target area.

**b. Welfare, Environmental, and Public Health Impacts**

**i. Welfare Impacts:** As part of our revitalization efforts, the City conducted an open house survey in July 2017. Residents believe that neighborhood crime has risen in recent years and economic struggles have contributed greatly to this trend. Residents voiced a distinct concern about visiting drug dealers and other non-residents bringing criminal activity to the neighborhood. Drugs, theft, and night-time safety are of greatest concern with half of survey respondents. Five years of crime data provided by the Pickens Police Department (PPD) from their *FBI Uniform Crime Reports (2012-2016)* revealed that local perception of neighborhood crime is justified. In the City, from 2012 to 2016, property crimes have risen by more than 40%, robberies have doubled, and violent crimes increased 73% in a period of time that only saw a 0.6% population growth. Pickens has also witnessed an increase in vagrancy and crimes associated with vagrants. In 2017, a vagrant overdosed on heroin in a vacant home in the target area. Police found the body several days later.

Blight and dilapidated structures do nothing to help curb the growing crime rates in the target community. Over 88% of the target area homes were built before 1979 and nearly 52% built before 1969 (ACS). Results from a door-to-door income survey completed in 2017 by City staff and volunteers revealed that renters make up a little less than half of the target area population and while the estimated average rent of \$578 per month is significantly less than the City average of \$697 (ACS), the housing conditions are far from desirable. Over 57% of open house survey respondents felt that houses in the neighborhood were not attractive and were in poor physical condition. The lack of quality, affordable housing has contributed to disinvestment which is only perpetuated by the low income of residents who often struggle to maintain their aging residences.

Unemployment in the target area is an astounding 48.6%, the poverty rate of 36% is more than double that of the national and state levels, and 42.4% of residents over the age of 25 have no high school diploma (ACS). In the 2017 door-to-door income survey, 57% of target area households qualified as “Low-to-Moderate Income” (LMI) according to HUD standards, with 68% being LMI persons. LMI equals 80% or below of an area’s median income.

Neighborhood public facilities such as sidewalks, street lights and parks are vital components for a healthy neighborhood. For residents to be able to spend less time in their cars by walking to places such as downtown, a park, City Hall or even their place of employment is valuable not only from a public health standpoint, but also from an economic standpoint. Within the target area, 22.5% of residents do not have access to a vehicle (ACS), making walk-ability an extremely important part of their lives. Open House survey data revealed that target area residents are unsatisfied with the condition of public facilities in their neighborhood. Only 16% of respondents suggested that there were adequate recreational facilities for children in the neighborhood, while only 42% suggested that there were adequate meeting places. A mere 25% of respondents were satisfied with the current state of neighborhood sidewalks. A critical high foot traffic area is on the eastern side of the target area along S. Lewis Street. Aside from being densely populated, the streets in this area connect neighborhood residents not only to Main Street, the Doodle Trail, and future Pickens Doodle Park to the north, but also to a variety of commercial businesses to the east along State Highway 8/Hampton Ave. Being able to walk safely to these locations is critical for low-to-moderate income residents with limited transportation resources.

**ii. Cumulative Environmental Issues:** Unfortunately, Pickens is home to the Sangamo-Weston Superfund Site, a massive 224-acre PCB-contaminated site where PCB-containing electrical capacitors were manufactured from 1955 to 1976. Sangamo notified EPA that during this time approximately 38,700 cubic yards of PCB waste were disposed on the plant site and an

undetermined amount was disposed in seven satellite dump sites. Approximately 17,000 cubic yards of waste have been removed and are contained in an EPA-approved landfill on the plant property. EPA and SCDHEC detected PCBs in run-off leaving the site which has impacted tributaries of Twelve-Mile Creek and Lake Hartwell.<sup>1</sup> According to the US EPA Superfund Site profile for this property (<https://www.epa.gov/superfund>), site contaminants include the heavy metals arsenic, beryllium, cadmium, chromium, lead, and thallium, numerous solvents, VOCs, SVOCs, and PCBs. Further studies have identified impacts to local water supplies and fish taken from downstream Lake Hartwell, with fish-consumption advisories still in effect. Fishing advisories have negative impacts on the local sports fishing industry, a noticeable blemish on a community attempting to rebuild its economy around tourism. The site continues to adversely impact the environment and present exposure risks to residents.

Pickens County ranked in the 80-90th percentile for dirtiest/worst counties in the US for volatile organic compound emissions, carbon monoxide emissions, and added cancer risks from hazardous air pollutants.<sup>1</sup> And while only a small percentage of residents in the target area have access to vehicles, 97.3% of commuters in Pickens drive an automobile to work (ACS), a fact that greatly increases the community risk for exposure to harmful air emissions.

**iii. Cumulative Public Health Impacts:** In an area burdened by significant poverty, industrial facilities and chemical pollutants associated with the target community have disproportionately burdened disadvantaged segments of the population. In our target area, families living in poverty are 120% more likely to be exposed to toxic chemical releases, and as stated before, the target community ranked in the 80-90th percentile for dirtiest/worst counties in the US for VOC emissions, carbon monoxide emissions, and added cancer risks from hazardous air pollutants.<sup>1</sup>

The target areas rank in the 66th percentile in the US for potential lead paint exposure and in the 95th percentile in the US for proximity to NPL sites.<sup>2</sup> Lead paint and asbestos exposure, typically associated with aging structures, poses increased risks to sensitive populations including children and the elderly, especially those living in poverty. In the target area, which has a significantly high African-American population (30.8% - ACS), people of color are 147% more likely to be exposed to toxic chemical releases and 117% more likely to be burdened by facilities emitting criteria air pollutants.<sup>1</sup> PCBs and other contaminants attributed to the Sangamo-Weston Superfund Site, have been identified in reservoirs and public water supply systems located within the local watershed. Long term monitoring of water supplies and replacement of portions of the water supply network contaminated with PCBs have been required to protect human health.

Dilapidated structures perpetuate the bleakness throughout the community. A lack of adequate recreational opportunities contributes to an obesity epidemic with substantial health impacts on local residents. Crime and blight discourage residents from walking to work, grocery stores, and other establishments encouraging a sedentary lifestyle which contributes to poor health. A 2015 Pickens County Community Health Survey by SCDHEC shows the death rate in Pickens County is higher than South Carolina's rate in chronic diseases such as heart disease, stroke, lung cancer, colorectal cancer and all cancers. The survey shows that 36.96% of residents are overweight, 28.34% are obese and 22.49% are physically inactive.

Public health risks present in the target area include those associated with the previously identified sites, numerous former and current service stations, former manufacturing facilities, and aging, dilapidated structures. The table below describes several common contaminants associated

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<sup>1</sup> (SCORECARD: The Pollution Information Site, 2017)

<sup>2</sup> (US EPA EJSCREEN: Environmental Justice Screening and Mapping Tool, 2017)

with the aforementioned historic site uses and resulting human health impacts from exposure to these contaminants.

Historic Use	Associated Contaminants	Resulting Human Health Impacts
Manufacturing (Former Textile Mill, etc.)	Asbestos, PCBs, VOCs, SVOCs, PAHs, Petroleum Products, Metals, Pesticides	<u>Asbestos</u> – increased rates of lung cancer, other lung diseases, cancer of the throat, larynx, stomach, colon and rectum. <u>PCBs</u> – highly toxic and can cause reproductive and developmental problems, damage the immune system, interfere with hormones and also cause cancer. <u>Arsenic</u> – cancer in skin, lungs, bladder and kidney. Can cause damage to chromosomes. (Metal)
Former Service/Filling Stations	Petroleum Products, VOCs, PAHs, SVOCs, Arsenic, Mercury, Lead, and other Metals	<u>Mercury</u> – toxic effects on the nervous, digestive and immune systems and lungs, kidneys, skin and eyes. (Metal) <u>Lead</u> – attacks the nervous system leading to reduced intelligence and behavioral and learning difficulties, children and developing fetus are at highest risk; death. (Metal) <u>VOCs/SVOCs/PAHs</u> – irritation to eyes, nose and throat; headaches, nausea and problems to the nervous system; cancer.
Dilapidated Structures	Asbestos, Lead, Petroleum Products (heating oil, etc)	<u>Petroleum products</u> – negative effects to nervous system, blood and kidneys; cancer. <u>Pesticides</u> – cancer (leukemia, non-Hodgkin's lymphoma, brain), problems with the nervous and reproductive system, liver, asthma.
<i>Information presented in this table is from the ATSDR Toxic Substances Portal (<a href="https://www.atsdr.cdc.gov/toxfaqs/">https://www.atsdr.cdc.gov/toxfaqs/</a>)</i>		

### c. Financial Need

**i. Economic Conditions:** Fortunately, Pickens is able to fund tourism-related activities via Hospitality Tax Funds (e.g. Doodle Trail) however, we do not have the ability to generate enough revenue to assess and cleanup Brownfields sites in the community. Being a small, rural community with low property tax base, lack of high paying jobs, high poverty rate, and high unemployment, utilizing local funds is not an option. With our general obligation bond capacity being used to purchase police, fire, street, grounds, and other equipment, there is simply not enough bonding capacity to complete this task. Funds from the City sales tax are credited to property owners against their property tax bill, meaning many residential properties do not pay a City property tax and the City is very limited by state law in how much the property tax millage can be raised. Since 2015, the City's general fund has only seen a 4% increase.

Along with the steady loss of textile mill and railroad jobs in the past, the OWT Industries plant (manufacturer of power driven hand tools) closed their Pickens facility in the winter of 2016 resulting in the loss of 325 local jobs. A recent Neighborhood Revitalization study conducted by City Staff in 2017 found that the citizens in Pickens are in desperate need of support. The unemployment rate is staggering with the City having a 19.6% unemployment rate, Pickens County having 9.6%, and within the Census Tract 104.2 Block Group 5 the unemployment rate is 48.6%. The City does not have the option to raise rates in a community where so few people are able to afford their bills let alone a rate increase to help fund needed projects such as Brownfield remediation. In a door to door survey of the neighborhood that encompasses the Pickens Doodle Park, Main Street, and many other sites 57% of the households with 68% of the individuals are considered to be "Low to Moderate Income" according to the Department of Housing and Urban Development standards. Due to the nature of the impoverished sites throughout the city limits, there are a plethora of dated, dilapidated structures that might be in need of remediation but will never be addressed without grant funding.

**ii. Economic Effects of Brownfields:** As demonstrated in the demographic table, the City's and target area's economic data is substantially more distressed than the County, State, and National levels resulting in lower tax revenues, which barely cover basic services. Blight and dilapidated structures, including brownfields, decrease property values and place a burden on municipal services. City resources that are tied up in securing these sites throughout the community could be better spent on revitalization efforts; however, without funding to secure these properties, they will continue to be a financial burden and revitalization roadblock for the City. Additionally, brownfields sites located throughout the target area, including those along Main Street, the City's core commercial corridor, discourage visitors and new businesses. The key indicators of our need may be that roughly 1 in 4 people in Pickens live in poverty. The railroad company is no longer in service due to the closing of many textile mills. The loss of OWT's manufacturing operation has further reduced the City's tax base and left the community with a vacant 95-acre manufacturing site with nearly 90 years of environmental stigma attached.

## **2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS**

### **a. Project Description, Redevelopment Strategy, and Timing and Implementation**

**i. Project Description and Alignment with Revitalization Plans:** We are requesting \$300,000 in total funds to be applied in and near the target area, which is home to the 18 potential sites already identified (see 1.a.iii.). This grant will fund up to 12 ASTM-AAI compliant Phase I ESAs (Environmental Site Assessments), 1 Generic Quality Assurance Project Plan (QAPP), 6 Site-Specific QAPPs, 6 Phase II ESAs, and 4 Analysis for Brownfields Cleanup Alternatives (ABCAs) or reuse plans (see Task Description in 2.b.i.). This project aligns with the Pickens **Downtown Revitalization Initiative**, which can be broken down into five strategic plans:

**1. Community Involvement and Interaction:** The goal of this strategic plan is to improve neighborhood involvement and interaction. Simply by investing in relationships, we have begun to see change in the community. Developing a sense of ownership in the community leads to sustainable, long-term change. Our Brownfields Program will support outreach efforts and maintain the initiative's community driven philosophy. These efforts will ensure the predominantly low income, minority population participates in and benefits from the program.

**2. Crime:** The goal of this strategic plan is to provide neighborhood safety and pride. We will utilize our Brownfields Program, a critical component of this plan, to promote the redevelopment of blighted sites, many of which are occupied by dilapidated structures where criminal activity is known to occur. Our Brownfield Cleanup Project (former rail depot) is an excellent example of how redevelopment of blighted sites can lead to a drop in crime as this former haven for vagrancy, drug-use, and other illicit activities is on its way to becoming a symbol of community pride.

**3. Housing and Physical Appearance:** The goal of this strategic plan is to improve physical appearance and property values and identify in-fill housing opportunities. Community surveys revealed that residents are unsatisfied with the condition and appearance of structures and vacant lots in the target area. Removal and renovation of vacant, dilapidated structures in the community allows for in-filling opportunities, reduces sprawl, and raises property values. Public-private partnerships (See section 2.c) have paved the way for the development of quality affordable housing in the target neighborhood. Brownfield funding will play an important role in addressing environmental concerns associated many of the dilapidated and/or vacant sites in the community.

**4. Public Facilities and Infrastructure:** The goal of this strategic plan is to improve the condition and accessibility of neighborhood road, sidewalk, street light, water, sewer and drainage facilities and improve and continue to develop public parks, trails, and recreational facilities. For residents

to be able to spend less time in their cars by walking to places such as downtown, to a park, or to City Hall is valuable not only from a public health standpoint, but also from an economic standpoint. Within the target neighborhood 22.5% (ACS) of residents do not have access to a vehicle, making the factor of *walk-ability* an extremely important part of their lives. In support of a public-private partnership which will bring 30 affordable housing units to the target area, the City will be utilizing over \$150,000 in public funding to upgrade existing water and sewer infrastructure for the development. In addition to recent utility upgrades, the City has plans to complete sidewalk upgrades from 2018-2019. Plans to expand the Doodle Trail will build upon the success of the Doodle Park project, which will provide the target area and City much needed park and recreation facilities and will increase connectivity and walkability through the area.

**5. Economy:** The goal of this strategic plan is to create a favorable environment for businesses resulting in business growth and development, job creation, and an increased tax base. By improving the business climate, the City aims to increase business attraction and retention, encourage small business development, and strengthen target industry clusters of recreational tourism, specialty retail, entrepreneurial businesses and light manufacturing. In order to revitalize the commercial corridor, the City understands that vacant and dilapidated properties must be addressed. A 2012 Market Analysis conducted by the City determined that approximately 39% of Pickens' retail customer base resides in areas outside of Pickens. This is a significant percentage of "visitor" retail for a rural city such as Pickens. The primary marketing goal outlined in the Revitalization Initiative includes further cultivation of tourism, which the City has embraced as evidenced by the city's development of the Town Creek Bike Park and the Doodle Trail.

**ii. Redevelopment Strategy:** Through the inventorying process, sites will be placed into three categories based on redevelopment potential and location within the target area. The categories can best be described as **Community Investments**, **Recreational Investments**, and **Economic Investments**. **Community Investments** are those improvements that increase neighborhood safety and pride, address infrastructure and public facility needs, identify in-fill housing opportunities, improve physical appearance and property values, and promote sustainability and conservation. **Recreational Investments** are those improvements that increase and improve not only our recreational tourism opportunities by bringing visitors to Pickens, but local community recreational opportunities as well. **Economic Investments** are those improvements that increase commercial interest and development and also encourage job creation and retention. Redevelopment within the Main Street Corridor is focused on economic redevelopment and therefore a higher emphasis is placed on sites with high economic investment potential. Redevelopment within the Doodle Trail Corridor focuses on recreation with a higher emphasis placed on sites with high recreational investment potential. Redevelopment within the Griffin Ebenezer Neighborhood is focused on improving living conditions, therefore, a higher emphasis is placed on sites with high community investment potential.

The City is paving the way for future redevelopment and has already started to see a return on our investments. An active, informed community, new zoning ordinances addressing land use and code enforcement, infrastructure upgrades and expansion, the Doodle Trail and Park, establishment of public/private partnerships, and opportunities to provide affordable housing options are a few of the results of our efforts to advance our revitalization initiative.

**iii. Timing and Implementation:** In addition to the preliminary Brownfields Inventory and community engagement activities, the City has assembled a Brownfields Task Force consisting of

City staff and elected officials, members of local community organizations and non-profits, community members, and private stakeholders who meet on a regular basis. (a) The City has acquired the services of a qualified environmental consultant through a competitive RFQ process for the implementation of their Brownfields Cleanup Grant. Should contractor selection need to be re-evaluated, procurement will be completed prior to notification of award through a competitive RFQ process in compliance with competitive procurement provisions of 2 C.F.R. 200 and EPA's rule at 2 C.F.R. 1500. (b) The City will utilize Brownfields funding to complete a more thorough inventory of sites categorized based on their redevelopment potential as Community Investments, Recreational Investments, and Economic Investments (See Section 2.a.ii). The City project team and Brownfields Task Force will be responsible for identifying and prioritizing sites with input from the community. (c) The City has started engaging owners of potential Brownfields sites, providing them with information on the "Brownfields Process" and the benefits of brownfields redevelopment, including the State's Voluntary Cleanup Program. Site access has been granted for the former automotive dealership and several other properties. The City will initiate site access processes for additional priority sites immediately upon notification of grant award. Our project team will contact site owners directly to negotiate site access. The City understands that community outreach is crucial to gain the cooperation of property owners and we plan to build upon our current outreach efforts.

#### **b. Task Descriptions and Budget Table**

**i. Task Descriptions:** Below is a list of anticipated tasks needed to effectively implement the City's Brownfields Program. Time and effort of City staff will be considered in kind leveraged services. Approximate costs are based on the City's past experience, advice from our current consultant, and advice from a local Brownfield grant recipient's project team (Central, SC).

**Task 1: Project Management** (\$15,000 total contractual - \$10,000 Hazardous Substance/\$5,000 Petroleum) The City will secure contractual support to complete project management activities that will include EPA Quarterly reporting, MBE/WBE reporting, ACRES reporting, development of EPA workplans, annual project projections, closeout reporting, and other activities required to ensure compliance with EPA cooperative agreement terms and conditions. The City's experience in managing our Brownfields Cleanup Grant and advice obtained from the Town of Central's project team (a current, local grant recipient) were used as a cost basis this task budget.

**Task 2: Community Outreach** The City will build upon our current community outreach efforts to further develop/maintain strategic and community partnerships. Community outreach efforts will involve public education and outreach as well as particular attention to the property owners whose sites will be accessed in the Phase I and Phase II assessments. Outreach efforts will continue over the three-year project period. The City and consultant will conduct the community outreach in cooperation with local partners and develop outreach information and protocols.

<b>Action / Deliverable</b>	<b>Purpose/Description</b>	<b>Budget (\$)</b>
<b>Update to Community Involvement Plan</b>	Provides funding for consultant to update our current CIP	\$1,000 Hazardous/\$500 Petroleum/\$1,500 Total
<b>Outreach Efforts / Events</b>	Contractual costs for Brownfields Task Force meetings/calls (monthly), community meetings (1/quarter), educational presentations, brochures, and social media management	\$9,000 Hazardous/\$5,500 Petroleum/\$14,500 Total
<b>Travel</b>	Travel funds for City staff to attend the National Brownfields Conference, EPA Region 4 Grantee's Workshop, or other brownfields training workshops	\$2,500 Hazardous/\$2,500 Petroleum/\$5,000 Total
<b>Total Budget for Task</b>	Community Outreach Budget	\$12,500 Hazardous/\$8,500 Petroleum/\$21,000 Total

**Task 3: Site Inventory & Characterization** The City will utilize the Brownfields Task Force, the selected environmental consultant, and the public for identification of potential Brownfields sites. Data collected during this process will be used to create and interactive Inventory of Brownfields Sites and to prepare GIS based maps for planning and redevelopment purposes. Phase I and Phase II funds may be used for natural resource surveys, wetlands surveys, asbestos surveys, lead paint surveys, mold surveys, and other applicable assessment activities.

Action / Deliverable	Purpose/Description	Budget (\$)
Site Identification, Prioritization, & Inventorying	Contractual costs for the identification, prioritization, and inventorying of potential Brownfields sites. Development of GIS based maps for planning and redevelopment purposes.	\$5,500 Hazardous/\$3,500 Petroleum/\$9,000 Total
Phase I ESAs	Contractual costs for approximately 12 Phase I ESAs (6 Hazardous / 6 Petroleum) averaging \$3,000 each	\$18,000 Hazardous/18,000 Petroleum/\$36,000 Total
Generic QAPP	Contractual costs for one Generic Quality Assurance Project Plan	\$2,500 Hazardous/\$2,500 Petroleum/\$5,000 Total
Site Specific QAPPs & Health & Safety Plan	Contractual costs for up to 6 SS-QAPPs (with sampling plans) and HASPs (4 hazardous/2 petroleum) at \$3,000 per site	\$12,000 Hazardous/\$6,000 Petroleum/\$18,000 Total
Phase II ESAs & equivalent assessment	Contractual costs for up to 6 Phase II ESAs or equivalent assessments (4 hazardous substances/2 petroleum) averaging \$30,000 for hazardous sites and \$25,000 for petroleum sites	\$120,000 Hazardous/\$50,000 Petroleum/\$170,000 Total
Total Budget for Task	Site Inventory & Characterization Budget	\$158,000 Hazardous/\$80,000 Petroleum/\$238,000 Total

**Task 4: Cleanup Planning** Cleanup planning will include calculating cleanup costs and determination of site remediation options based on anticipated reuse planning. The City will work with local community members, potential developers, other stakeholders, and the selected consultant to develop reuse plans for selected sites.

Action / Deliverable	Purpose/Description	Budget (\$)
Charrettes / Visioning Sessions	Contractual costs for charrettes and visioning sessions to develop reuse plans and engage community members	\$2,250 Hazardous/\$750 Petroleum/\$3,000 Total
Cleanup Planning	Contractual costs for Analyses of Brownfields Cleanup Alternatives (meeting SCDHEC VCP requirements) for up to four sites (3 hazardous/1 petroleum) at \$5,750 per site	\$17,250 Hazardous/\$5,750 Petroleum/\$23,000 Total
Total Budget for Task	Cleanup Planning Budget	\$19,500 Hazardous/\$6,500 Petroleum/\$26,000 Total

## ii. Budget Table

Budget Categories	Project Tasks				
	1. Project Management	2. Community Outreach	3. Site Inventory & Characterization	4. Cleanup Planning	Total
<b>Hazardous Substance</b>					
Travel	-	\$2,500	-	-	\$2,500
Contractual	\$10,000	\$10,000	\$158,000	\$19,500	\$197,500
<b>Total Hazardous</b>	<b>\$10,000</b>	<b>\$12,500</b>	<b>\$158,000</b>	<b>\$19,500</b>	<b>\$200,000</b>
<b>Petroleum</b>					
Travel	-	\$2,500	-	-	\$2,500
Contractual	\$5,000	\$6,000	\$80,000	\$6,500	\$97,500
<b>Total Petroleum</b>	<b>\$5,000</b>	<b>\$8,500</b>	<b>\$80,000</b>	<b>\$6,500</b>	<b>\$100,000</b>
<b>Grand Total</b>	<b>\$15,000</b>	<b>\$21,000</b>	<b>\$238,000</b>	<b>\$26,000</b>	<b>\$300,000</b>

**c. Ability to Leverage:** The Doodle Park project is an inspiring example of the City's ability to leverage funding from both private sources and public grants originating from a range of state, regional, and federal organizations. To date, we have leveraged \$1,133,555 to remediate and redevelop the park site and construct the first extension of the trail network. As evidenced by this project, the City understands that while brownfield grant funds are vital for the redevelopment of brownfields site, they only serve as a catalyst. The ability to leverage resources in the form of grants, loans, tax funding and incentives, and other sources is crucial to a successful redevelopment effort. The following table includes a listing of secured, pending, and potential sources of leveraged funding that the City plans to utilize as part of our Downtown Revitalization Initiative. Documentation of secured resources is attached (Appendix B).

<b>Source</b>	<b>Purpose/Role</b>	<b>Amount (\$)</b>	<b>Status</b>
City of Pickens Staff	In-kind services towards the implementation of the brownfields cooperative agreement	\$21,900 minimum	Secured resource
City of Pickens Staff	In-kind services towards the management and implementation of Downtown Revitalization Initiative (Not specific to Brownfields grant)	\$168,600 minimum	Secured resource
US EPA Brownfields Cleanup Grant	Abatement of Asbestos Containing Building Materials in former rail depot at Doodle Park	\$127,000	Secured Resource
SC Department of Commerce CDBG Funding	Demolition of former rail depot at Doodle Park and site grading	\$185,000	Secured Resource
SC RTP Grant	Extension of the Doodle Trail Network	\$100,000	Secured Resource
ARC Grant	Development of the Pickens Doodle Park	\$500,000	Secured Resource
Pickens County Accommodation Tax Grant	Construction of Doodle Park amenities	\$7,000	Secured Resource
Duke Energy Foundation Grant	Construction of Sensory Garden at Doodle Park	\$13,000	Secured Resource
SC Municipal Association Hometown Econ Dev Grant	Doodle Park mural and Turtles on the Town Project	\$20,000	Secured Resource
Easley Downtown Investment (EDI), LLC	Funding to develop 30 affordable housing units and a portion of the required infrastructure in the target area	Estimated \$1.5 million investment	Secured Resource
City of Pickens Public Works Department	Infrastructure development associated with EDI, LLC affordable housing development	Minimum of \$165,000	Secured Resource
CDBG Neighborhood Revitalization (NR) Grant	Sidewalk construction and repair and demolition of dilapidated structures	\$475,230	Secured Resource
SC Department of Energy	Installation of solar lighting at Doodle Park	\$10,000	Secured Resource
AnMed Cannon Hospital	Development of Doodle Park	\$100,000	Pending Resource
City of Pickens Public Works Department	Project Engineering associated with the CDBG NR Grant	\$47,523 (est)	Pending Resource
SC DOT – Transportation Alternative Grant	Construction of the Downtown Doodle Connector	\$204,294	Pending Resource
COPs Grant	Funding for a Code Enforcement Officer to uphold zoning and City codes in the target area, including recently passed nuisance and unsafe structure ordinances	\$125,000	Pending Resource
CDBG NR Grant (The City plans to apply for this funding in or around 2020 as a continuation of their currently pending NR grant)	Street resurfacing, walking path construction, sidewalk construction, further demolition of dilapidated structures (if needed), and water line replacement in target area	\$410,840	Potential Resource
City of Pickens Public Works Department	Project Engineering associated with the potential second CDBG NR Grant	\$41,084 (est)	Potential Resource

### **3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS**

#### **a. Engaging the Community**

**i. Community Involvement Plan:** The City understands that community engagement is crucial for a successful redevelopment effort. We plan to utilize the following 3 step approach to build on community engagement efforts already in effect to generate increased community involvement:

**1. Plan** – The City has developed a Brownfields Task Force that is already responsible for providing direction and promoting our Brownfields Program. The Task Force is vital in communicating with the community and implementing outreach activities. A Community Involvement Plan has been developed and will be updated, laying the foundation for outreach efforts and establishing a schedule for outreach activities. Monthly meetings with the project team will provide updates.

**2. Get Involved** – In addition to the City's current community meetings, an initial community-wide kick-off meeting will notify the community of assessment project commencement, present an anticipated project schedule, and solicit community input. Currently, the City and Task Force host regular outreach activities as a means to keep the community updated on project happenings and provide a platform for public input. Community charrettes and visioning sessions will be utilized in the development of cleanup, reuse, and redevelopment plans. As we did with our cleanup grant, the City will continue to collaborate with local schools to provide educational opportunities and promote interest and career development in the environmental sciences. The City intends to host at least one outreach activity every quarter.

**3. Spread the Word** – Pickens understands that utilizing one form of media alone will severely limit outreach efforts. The City will continue to utilize various forms of media to communicate with the community throughout the life of their Brownfields program and beyond, including: a project brochure to be distributed throughout the community; a project website to provide project news, educational materials, and other information; regular press releases to keep the community up-to-date on project milestones and project events; social media to provide real-time project updates, photos, news, and opportunities for public input; and, word-of-mouth. By utilizing the Task Force and properly educating the community, this time tested method of communicating serves as the cornerstone of public outreach activities, allowing community members to take ownership of their Brownfields Program and express pride in its accomplishments.

**ii. Communicating Progress:** The City will provide regular updates to the community and stakeholders by utilizing the range of communication methods indicated in the 3 step approach described above to effectively communicate progress of grant activities to all community members. Frequent communication with the community will keep the community engaged and invested in the Downtown Redevelopment Initiative and will ensure success. The City's ability to communicate with the community and their willingness to participate in this initiative are evidenced by the strong turnout for recent community meetings averaging over 20 in attendance.

#### **b. Partnerships with Government Agencies**

**i. Local/State/Tribal Environmental Authority:** The SC Department of Health and Environmental Control (SCDHEC) is the State Agency responsible for hazardous waste and petroleum cleanup oversight. SCDHEC will provide site eligibility reviews, review of assessment reports and ABCAs/cleanup plans. Potential developers will be directed to the State's Voluntary Cleanup Program for liability relief and cleanup oversight.

**ii. Other Governmental Partnerships:** In addition to the support and guidance provided by the EPA, the SC Department of Commerce (SCDOC), Appalachian Regional Commission (ARC), SC Department of Parks, Recreation, and Tourism (SCDPRT), the Department of Housing and Urban Development (HUD), SC Department of Transportation (SCDOT), and Pickens County have been vital to the City's redevelopment efforts so far and continue to support our redevelopment efforts through grant support and guidance.

The SCDOC has pledged to continue their support of Pickens and our revitalization efforts. SCDOC has provided grant funding and support to Pickens on our past projects, including our Downtown Revitalization Initiative and the Doodle Park project. They have demonstrated their willingness to assist with the identification and procurement of additional funding to support our continued revitalization efforts throughout the community. A full list of other governmental and non-governmental partners is included in the table of leveraged funding sources (see 2.c.).

**c. Partnerships with Community Organizations**

**i. Community Organization Descriptions & Roles:** The City through our community outreach efforts and relationships established during the Downtown Revitalization Initiative, including our Brownfields Cleanup project, has identified partners for our Brownfields program. The following organizations have provided much needed community support to the City's redevelopment efforts and have pledged their support to the City's Brownfields Program:

Organization	Description	Support Role
Griffin Ebenezer Baptist Church	Church located in target area	Dissemination of information and educating community; will provide meeting space as needed
Pickens YMCA	Charitable organization promoting youth development, healthy living, and social responsibility	Hosting educational workshops / events for youth and/or adults in the community and provide meeting space as needed
Arise from the Ashes CDC	Local non-profit community development corporation	Volunteering, educating through forums/town hall meetings, dissemination of information
Pickens Senior Center	Local community center primarily serving local seniors	Will provide meeting space
Pickens Rotary Club	International service organization	Dissemination of information, assistance in site selection, and facilitating conversations with site owners

**ii. Letters of Commitment:** Letters of support including contact information for the above community organizations are attached (Appendix C).

**d. Partnerships with Workforce Development Programs:** Pickens takes pride in hiring and buying local whenever practical and this project will be no exception. There are no EPA funded Workforce Development programs within commuting distance of Pickens. As part of the City's procurement process, the City will encourage the selected contractor and subcontractors to hire local people and companies when possible, utilizing services such as South Carolina Works, a partnership linking the State's Workforce Investment Boards.

**4. PROJECT BENEFITS**

**a. Welfare, Environmental, and Public Health Benefits:** Being home to one of SC's largest environmental disasters (Sangamo-Weston Superfund Site) has made improving environmental quality a top priority for Pickens. Identifying and assessing Brownfields sites is the first step in

our plan to create a healthier, safer, and environmentally friendly community. The City anticipates the following welfare, environmental, and public health benefits from their Brownfields Program:

- Cleanups at brownfield sites and redevelopment of aging housing stock will reduce exposure risks to harmful substances, including lead and asbestos, resulting in a reduction in exposure to carcinogens, reduction in learning disabilities in children, reduced blood lead levels, and fewer instances of birth defects and infant deaths.
- Cleanup and redevelopment of dilapidated structures results in fewer areas where certain crimes are likely to occur thus lowering instances of crime resulting in a better sense of community and increased mobility among residents.
- Removal of vacant and dilapidated structures will pave the way for in-fill opportunities including the construction of affordable housing and public facilities in the target area.
- Redevelopment of brownfields will help attract businesses, bringing jobs to the community. Lower unemployment rates can help to increase health insurance coverage in the community providing obvious health benefits. In addition, lower unemployment will allow residents to afford to maintain their homes, preventing a return to the current state of the community.
- Assessment and, if needed, the remediation of properties identified for utilization in the expansion of the Doodle Trail will ultimately provide increased transportation options resulting in reduced energy consumption and reduced air, water, and noise pollution. Expansion of the trail network will also provide increased recreational activities resulting in a more physically active community. A 2016 Doodle Trail User Survey Report completed by Clemson University for the City revealed that over half (63.7%) of all respondents would participate less or not at all in their favorite trail activity (biking, walking, or running) if the trail was not available.
- The local high school is a 40-minute walk from the target area through some of the most crime ridden parts of the community. Reduced crime rates and increased transportation options through brownfields redevelopment will help to eliminate this roadblock to educational attainment.
- Identification, assessment, and cleanup of contaminants in the community will protect the public from both direct and indirect exposure to contaminants resulting in an overall improvement to air, water, and soil quality; thus, reducing the burden on sensitive segments of the population, including children, minority populations, and the impoverished.

**b. Economic and Community Benefits:** The Appalachian Region has become one of the top regional and national tourist destinations, attracting outdoor enthusiasts year-round; history buffs are drawn to the rich-cultural heritage ranging from the Cherokee Indians to Revolutionary War battlefields; sports and entertainment venues, including the nearby Clemson University football program draw a passionate fan base that represents the largest annual tourism draw to the region; and the region's remarkable trail systems have had tremendous public health and economic impacts. According to a 2012 U.S. Travel Association study titled "The Economic Contribution of Tourism in South Carolina", South Carolina tourism is a \$15 billion + per year industry that supports one out of every ten jobs in South Carolina and produces more than \$1.2 billion in local and state tax revenues. By creating a welcoming environment and desirable amenities, expanding our trail network and creating recreational opportunities, we hope to capitalize on local tourism instead of being overlooked by visitors who see a community that is unsafe and full of blight.

By removing the environmental stigma from properties around the community, the City hopes to encourage further infill development resulting in business development, job creation, and an increased tax base. A 2008 study titled *The Environmental and Economic Impacts of Brownfields Redevelopment*, indicates that typical Brownfields performance creates 11 jobs per

redeveloped acre. Based on this information, redevelopment of only the two identified priority sites, accounting for over 27-acres, could create over 297 jobs. In addition, a reduction in crime and blight as a result of brownfield redevelopment will result in a reduced burden on local services, allowing time and finances currently tied up in addressing these concerns to be reallocated to other community revitalization efforts such as community branding and marketing, community education initiatives, and public/private partnerships.

## **5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Audit Findings:** For at least the last four fiscal years (including FY16-17), Pickens has received an “unmodified opinion” from the required state financial audits, the best opinion one can receive. No adverse findings on administration of any grants have been identified.

**b. Programmatic Capability:** The Pickens City Administrator and Program Director, **Mr. Bruce Evilsizor**, will be responsible for timely and successful expenditure of funds and completion of technical, administrative and financial requirements of the project. **Ms. Becky Horace** serves as the Project Manager for the City’s Brownfields team assisting Mr. Evilsizor with the administration of the City’s Brownfields Program. They will be assisted by **Ms. Sharon Hager**, the City’s Finance Director. Utilizing our 2 C.F.R. 200 and EPA’s rule at 2 C.F.R. 1500 compliant “Professional Service” procurement process, we have procured a qualified environmental consultant to assist with technical and reporting portions of our current Brownfields Cleanup Project, and based on our contractual agreement, the City intends to continue to utilize our current qualified environmental consultant for Brownfield assessment activities. Should additional expertise or resources be required, this same procurement process will be utilized.

**Mr. Evilsizor** is currently serving as Program Director for the City’s Brownfields Cleanup Project of the future Doodle Park. He has been involved in federal grants since the early 1990’s. He has been responsible for Ohio EPA Brownfield, Federal Highway, CDBG, Ohio Public Commission, and ARC grants. He has a Masters Degree in Public Administration from the University of Dayton (Ohio) and over 30 years of local government experience.

**Ms. Horace** is the Project Manager for Pickens and is responsible for grant administration, zoning and planning, and community outreach. Ms. Horace earned her Master’s in Public Administration in 2012 during which time she had several internship opportunities working for different municipalities in South Carolina. Ms. Horace has been with the Pickens as project and grant manager since January 2016. During this time, Ms. Horace has been responsible for the acquisition and implementation of grants totaling nearly \$1.8 million.

**Ms. Hager** is very proficient in our Harris Local Government accounting software and our Online Banking service. Ms. Hager has 12 years of local government experience and is very proficient in accounting, payroll, accounts payable, reporting and learning new processes.

**c. Measuring Environmental Results: Anticipated Outputs/Outcomes:** Progress will be tracked, measured, and reported by Mr. Bruce Evilsizor, Brownfields Project Director, who will utilize the Brownfields Task Force and the environmental contractor to assist with tracking and measuring progress and will submit quarterly reports to the EPA. The following table lists the anticipated outputs and outcomes of this project.

Focus Area	Outcomes	Outputs
Community Engagement	Number of community members engaged through project activities	<ul style="list-style-type: none"> <li>• Completion of community engagement plan</li> <li>• Number of community meetings and visioning sessions</li> <li>• Number of attendees at meetings</li> </ul>
Site Inventorying, Assessment, & Cleanup Planning	Number of Brownfields properties identified; number of acres assessed; number of sites entered into SCDHEC VCP; number of cleanup plans developed; number of people protected from environmental contamination	<ul style="list-style-type: none"> <li>• Completion of Site Inventory</li> <li>• Acres of land assessed</li> <li>• Number of Phase I ESAs completed</li> <li>• Number of Phase II ESAs (or equivalent) completed</li> <li>• Number of SS-QAPPs completed</li> <li>• Number of HASPs completed</li> <li>• Number of ABCAs completed</li> <li>• Number of Voluntary Cleanup Contracts negotiated</li> </ul>
Health, Welfare, Environmental, and Economic Benefits	Number of sites returned to productive use; amount of public and private funds leveraged; increase in tax revenue, jobs	<ul style="list-style-type: none"> <li>• Number of properties/acres made ready for redevelopment</li> <li>• Number of developers engaged</li> <li>• Number of new jobs created</li> <li>• Number of new businesses created</li> </ul>

#### **d. Past Performance and Accomplishments**

##### **i. Currently or Has Ever Received an EPA Brownfields Grant**

**1. Accomplishments:** In 2016, the Pickens was awarded \$127,000 in US EPA Brownfields Hazardous Substance Cleanup Funds (Grant #00D47716) to complete abatement of asbestos containing materials at the former Pickens Railroad Depot. The budget, including the City's cost share, is \$153,000. In our grant application for this project, it was indicated that we would track and document project outputs in quarterly progress reports, ACRES updates, and monthly Task Force meetings/calls. As of November 16, 2017, required reporting is current, site cleanup activities are complete, and the project is on track to close out by year end, almost a year ahead of the original schedule. Outreach activities include five outreach events ranging from an educational workshop for the local middle school science club to community input meetings. Not only has this brownfields project resulted in the cleanup of a 1.86-acre property, but as a result of the cleanup, the City has managed to leverage \$1,133,555 in public and private funding to complete redevelopment of the site. Following site cleanup, site redevelopment activities have been initiated with an anticipated grand opening of the Doodle Park in May 2018. The park will include a rail depot replica, an open air farmers' market, a train themed playground, ADA accessible park facilities, solar lighting, and a sensory rain garden for children with sensory processing disorder that doubles as a storm water management feature.

Current and anticipated outcomes from this project, include: reduction of threats to safety, human health, and the environment through the removal of contamination and demolition of the structure; an increase in local property values; the creation of temporary jobs; increased tax revenue; and increases in public health and welfare through the creation of the farmers' market which will allow for fresh food options, greenspace, and increased outdoor recreation opportunities. The City will carry this success into other projects associated with our revitalization.

**2. Compliance with Grant Requirements:** As described above, the City has completed or is well underway on many of our project goals and milestones on our existing cleanup grant, including the workplan and compliance with all terms and conditions, and we're nearly a year ahead of schedule. Quarterly reports and ACRES data entry are being completed on time. All planned funds will be expended by the end of the grant period.

# Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☐ Preapplication  
☒ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

\* If Revision, select appropriate letter(s):

\* Other (Specify):

**\* 3. Date Received:**

11/15/2017

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

City of Pickens

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

57-6001095

**\* c. Organizational DUNS:**

0513928010000

**d. Address:**

**\* Street1:**

219 Pendleton Street

**Street2:**

**\* City:**

Pickens

**County/Parish:**

**\* State:**

SC: South Carolina

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

29671-2458

**e. Organizational Unit:**

**Department Name:**

**Division Name:**

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

**\* First Name:**

Bruce

**Middle Name:**

**\* Last Name:**

Evilsizor

**Suffix:**

**Title:**

**Organizational Affiliation:**

**\* Telephone Number:**

864-898-8160

**Fax Number:**

864-878-0450

**\* Email:**

bevilsizor@pickenscity.com

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-17-07

\* Title:

FY18 GUIDELINES FOR BROWNFIELDS ASSESSMENT GRANTS

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

City of Pickens, SC -- FY2018 US EPA Brownfield Assessment Grant

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant

3

\* b. Program/Project

3

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date:

10/01/2018

\* b. End Date:

09/30/2021

**18. Estimated Funding (\$):**

* a. Federal	300,000.00
* b. Applicant	0.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	300,000.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:

\* First Name:

Bruce

Middle Name:

\* Last Name:

Evilsizor

Suffix:

\* Title:

City Administrator

\* Telephone Number:

864-898-8160

Fax Number:

\* Email:

bevilsizor@pickenscity.com

\* Signature of Authorized Representative:

Bruce J Evilsizor

\* Date Signed:

11/15/2017



## The Pelzer Heritage Commission

Post Office Box 627  
Pelzer, South Carolina 29669

November 13, 2017

Ms. Barbara Alfano  
Brownfield Coordinator  
Environmental Protection Agency, Region IV  
Atlanta Federal Center, 10<sup>th</sup> Floor  
61 Forsyth Street, SW  
Atlanta, Georgia 30303-8960

RE: EPA Hazardous Brownfield Cleanup Application  
Upper Pelzer Mill Site, Pelzer, South Carolina

Dear Ms. Alfano:

On behalf of the Pelzer Heritage Commission (PHC), I am pleased to submit the enclosed hazardous brownfield cleanup application for the Upper Pelzer Mill Site in Pelzer, South Carolina. PHC is a 501(c)3 non-profit public charity as recognized by the Internal Revenue Service. The letter acknowledging this status is included with the Threshold Criteria.

PHC acquired the Former Pelzer Mill complex, including the Upper Mill Site via a donation on December 27, 2013, after entering into a Voluntary Cleanup Contract with the South Carolina Department of Health and Environmental Control (DHEC). A Phase II Environmental Site Assessment, Asbestos Survey, and Lead-based Paint Survey were performed by the Concurrent Technologies Corporation as part of the Town of Pelzer's EPA Brownfields Assessment Grant. It was found that the soils on the site were contaminated and that the old warehouse that remains contains asbestos and lead-based paint. This grant is needed to address the environmental contamination found at the property. PHC is pleased to tell you that we have entered into a contract with a developer, State Investors LLC, who plans to lease the property and construct 2-3 buildings for commercial or light industrial use. We are so thrilled to have the opportunity to bring some jobs to Pelzer.

- a. **Applicant Identification:** Pelzer Heritage Commission  
Post Office Box 627  
Pelzer, South Carolina 29669
- b. **Funding Requested**
  - i): **Grant Type:** Single Site Clean-up
  - ii): **Federal Funds Requested:** \$200,000; We are not requesting a cost-share waiver.
  - iii): **Contamination:** Hazardous Substances
- c. **Location:** Pelzer, Anderson County, South Carolina

d. Property Information: Former Upper Pelzer Mill  
Smythe Street and Stevenson  
Street  
Pelzer South Carolina 29669

e. Contacts:

- i) Project Director:  
Mr. Larry Coker  
Pelzer Heritage Commission  
872 Cooley Bridge Road  
Pelzer, South Carolina 29669  
Phone: 864 243 9120  
E-mail: [lcoker8@att.net](mailto:lcoker8@att.net)
- ii) Chief Executive:  
Ms. Dianne Lollis  
President, Pelzer Heritage  
Commission  
Post Office Box 627  
Pelzer, South Carolina 29669  
Phone: 864 847 5743  
E-mail: [missetta@charter.net](mailto:missetta@charter.net)

f. Population:

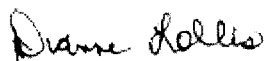
- i) PHC not a municipal form of government.
- ii) Targeted Area Population: 82, Town of Pelzer, ACS 2015 5-year estimate data, Census.gov, accessed November 2017
- iii) The Town of Pelzer is located in Anderson County which has not experienced persistent poverty over the past 30 years.

g. Other Factors Checklist: Attached

- h. Letter from the State Environmental Authority: Ms. Daphne Neel, Bureau Chief for the South Carolina Department of Health and Environmental Control's Bureau of Land and Waste Management, issued a letter acknowledging this grant proposal and DHEC's support of the planned clean-up of the Upper Pelzer Mill site. The DHEC letter is included as an attachment.

Thank you for your time and consideration. If you have any questions, please do not hesitate to contact me at 864 847-5743.

With best regards,



Dianne Lollis  
President

### Appendix 3 Cleanup Other Factors Checklist

Name of Applicant: Pelzer Heritage Commission in Pelzer, South Carolina

Please identify (with an **X**) which, if any of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	X, P. 2
The jurisdiction is located within, or includes, a county experiencing "persistent poverty" where 20% or more of its population has lived in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion, by identifying in the proposal the amounts and contributors of resources and including documentation that ties directly to the project.	X, P. 10,11
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	



November 10, 2017

Barbara Alfano  
Region 4 Brownfields Coordinator  
United States Environmental Protection Agency  
Resource Conservation and Restoration Division  
61 Forsyth Street SW  
Atlanta, Georgia 30303-8960

RE: EPA Brownfields Cleanup Grant  
Pelzer Heritage Commission, Pelzer, South Carolina

Dear Ms. Alfano:

The South Carolina Department of Health and Environmental Control, the State's environmental authority, acknowledges and fully supports the Pelzer Heritage Commission's (PHC) application for a Brownfields Cleanup Grant for environmental cleanup of the Pelzer Upper Mill site in Pelzer, South Carolina. The grant will facilitate redevelopment of the site for light industrial use.

The Department appreciates your consideration of the application and hopes for a favorable outcome. Your positive response will assist the PHC in its efforts to revitalize the community. If you have any questions or need additional information, please contact Robert Hodges of my staff at (803) 898-0919.

Sincerely,

A handwritten signature in cursive script that reads 'Daphne Neel'.

Daphne Neel, Chief  
Bureau of Land and Waste Management

cc: Chris McClusky, Upstate EA Anderson  
Robert Hodges, Manager, Brownfields Program

# NARRATIVE PROPOSAL/RANKING CRITERIA

## 1. COMMUNITY NEED

### 1.a. Target Area and Brownfields

#### 1.a.i. Community and Target Area Descriptions

Twelve miles southeast of the City of Greenville's bustling downtown, and just across the Saluda River's border into neighboring Anderson County, lies the quiet town of Pelzer, South Carolina. This small, yet closely-knit community is deeply rooted in the textile industry. Drawn to the banks of the Saluda River as a power source during the South's Reconstruction period, the Pelzer Manufacturing Company's four mills were constructed in the late 1800s, rapidly growing to become the largest mill community in the South and one of the largest in the world. The mills were not only significant in terms of size and production capability, but also because of the technology employed at the time. Pelzer Mill No. 1 was the first cotton mill to have an incandescent lighting system as well as the first electric generators. Pelzer Mill No. 4 was the first textile mill to be powered solely by electricity, and even more impressively, via overhead cables from a power plant located four miles away. Eventually Mill No. 4 came to be known as the Upper Mill due to its location further upstream from Pelzer Mills Nos. 1-3 which were collectively grouped together and subsequently named the Lower Mill.

Poor tenant farmers and sharecroppers who had struggled to scratch out an existence in South Carolina's upstate were drawn to the promise of a steady paycheck and a living situation that was deemed 'new' and 'better' than their rural origins. Consequently, the sleepy area that had once been a simple ferry crossing-turned-bridge spanning the river rapidly evolved into a mill town with a distinct working class. This sudden migration of thousands of workers and their families was supported entirely by the Pelzer Manufacturing Company. The homes, stores, churches, banks, hotel, and motion picture theatre were all owned and operated by the mill corporation. Mill workers (comprised mostly of white men, women, and children of all ages) worked long hours in the mills – just as they had in the fields – and the paychecks, albeit steady, were low. However, as the mills flourished (operating 136,000 spindles and looms during peak production in the 1920s) so did the community, becoming as closely knit to their fellow laborers as they were dependent on the mill. Pelzer was decimated by the loss of its primary industry, when foreign competition forced the mills to cease production and shutter their doors. Production dwindled, then finally ceased in the mid-1990s. A mostly uneducated blue-collar workforce that had been tied to the mill for generations now found themselves with no source of local employment and forced to move from their family homes to seek work elsewhere. The once healthy Pelzer area population of more than 4,000 during peak production rapidly declined in the years following the mill's closure. Though the number of residents declined, the pride and the love of their heritage of those who grew up on the "mill hill" remained.

In 2010, the "mill hill" kids who now lived in Pelzer, West Pelzer, Williamston (just over 2 miles south of Pelzer), and beyond united to form the Pelzer Heritage Commission (PHC). This group of people, born and raised in Pelzer, came together with a vision to save and preserve the rich heritage that belongs to the town. With few assets but plenty of Pelzer Pride, this group set out to revive the old Pelzer spirit and its special memories. Reunions held at the historical Pelzer gym brought scattered residents back to town. Festivals held in the old Monkey Park displayed Pelzer crafts and local merchants. Events held at the school auditorium brought back memories of plays and musicals enjoyed by grandparents. Two books published help preserve Town memories and

veterans' service records. PHC's fundraising efforts occur at these events. They sell T-shirts, and books. Now, the PHC has acquired all of the former mill properties, 72 acres, in an effort to redevelop the sites for the benefit and use of the entire community. This task is a difficult one for a non-profit organization led by volunteers. However, the organizations has received significant help from Anderson County and others to move these projects forward.

The Upper Mill sits within the Town of Pelzer at the intersection of Smythe Street and Stevenson Street. The Town of Pelzer – a small community of 82 residents (2015 ACS US Census Bureau) – is the selected Target Area for this grant application

*1.a.ii. Demographic Information and Indicators of Need*

**Target Area and Comparison Geographies**  
ACS 2015 5-year estimate data, Census.gov November 2017

Demographic	TARGET AREA (Town of Pelzer)	Anderson County	South Carolina	United States
Population	82	191,215	4,777,576	316,515,021
Percent Minority (Alone)	12.2%	19.9%	32.8%	26.4%
Percent African-American (Alone)	6.0%	16.4%	27.5%	12.6%
Percent Hispanic (Alone)	3.6%	3.3%	5.3%	17.1%
Percent Children (5 -under)	13.4%	6.0%	6.1%	6.3%
Percent Elderly (65-over)	20.7%	16.6%	15.2%	14.1%
High School Graduate or Higher	94.7%	82.8%	85.6%	86.7%
Bachelor Degree or Higher	8.8%	19.5%	25.8%	29.8%
Poverty Rate	29.3%	16.4%	17.9%	15.5%
Families with Children Below Poverty (under age 18)	50.0%	21.0%	22.0%	18.0%
Per Capita Income	\$17,089	\$22,400	\$24,604	\$28,930
Households with Food Stamp/SNAP	17.9%	15.4%	15.1%	13.2%
Median Household Income	\$38,750	\$42,143	\$45,483	\$53,889
Unemployment Rate	12.5%	9.2%	9.5%	8.3%
Median Home Value	\$95,000	\$128,100	\$139,900	\$178,600
Percent Vacant Homes	30%	13.2%	16.5%	12.3%
Percent Rental Homes	47%	28.1%	31.4%	36.1%
Percent Built Before 1939	67.5%	6.3%	4.6%	13.2%

Pelzer is a poor, struggling town. The small community of Pelzer has a twice as many children (13%) and more elderly (21%) residents than the county (6%, 17%), state (6%, 15%), and nation (6%, 14%). The community is poor with half of all families (50%) with children living in poverty – more than double the county (21%), state (22%), and nation (18%). No new home construction has been seen in the community since the 1980s and over two thirds of the homes (68%) were constructed before 1939 compared with only 6% for the county and 5% for South Carolina as a whole. Home values are low (\$95,000), nearly 50% are rental properties, and 30% are vacant – all greatly exceeding county, state, and national averages. Per capita (\$17,089) and median household income (\$38,750) are well below these comparison geographies and more households receive Food Stamp/SNAP assistance (18%). While high school attainment is high (94.7%), only about 9% have a Bachelor degree or higher level of education versus 20% for Anderson County, 22% for South Carolina, and 30% nationally. The US EPA Environmental Justice Screen Tool confirms that Census Block Group containing the brownfields property (450070103004) is in the 88<sup>th</sup> percentile for low income population groups in South Carolina, 87<sup>th</sup> for EPA Region 4, and 89<sup>th</sup> nationally (<https://ejscreen.epa.gov>, Accessed October 2017).

*1.a.iii. Description of the Brownfields*

The properties originally owned by the Pelzer Manufacturing Company include 4 main parcels grouped in three properties: the Upper Mill, the Lower Mill, and a Dump Site (2 parcels). In the 2000s, these shuttered mill properties changed hands several times before they were sold to Greenlight Enterprises, LLC (Greenlight) and Brickyard Trucking, Inc. (Brickyard). Brickyard and Greenlight are related companies with the same managing members. With this sale, the Pelzer community anticipated positive changes and had high hopes for job creation, new home construction, park facilities on the Saluda River, cleanup of environmental hazards, and the removal and reuse of the dilapidated mill structures. Demolition work began on the Upper and Lower Mills, and while the town's people were understandably saddened and emotional to see this part of their history being torn down, they eagerly anticipated positive changes.

Unfortunately, once the salvageable materials were removed, work ceased. The sites were left in a deplorable condition. Greenlight became an absentee owner with no interest in reviving the property once the potential money-making materials had been recovered. Recognizing the physical hazards that the mill complex posed to the residents living adjacent to it – with partially demolished buildings and debris strewn across the property – and not knowing the environmental hazards, the Town of Pelzer began taking steps to address these concerns. Pelzer applied for and received a \$200,000 brownfields hazardous assessment grant in 2010 to assess the status of environmental conditions of the Upper and Lower Mill sites. Additional funding was provided by Anderson County's grant program and the EPA Region IV's Targeted Brownfields Assessment (TBA) Program to assess mill properties lying outside the town's boundaries.

For the **Upper Mill** property, a Phase II ESA found Polycyclic Aromatic Hydrocarbons (PAHs) exceeding the EPA Regional Screening Levels (RSLs) for industrial residential uses across most of the property's surface and in some subsurface soils. The South Carolina Department of Health and Environmental Control (SCDHEC) uses the EPA's Regional Screening Levels (RSLs). Metals at levels greater than EPA RSLs for residential and industrial use were found in soils primarily on the central and southern portions of the property and in groundwater (exceeding EPA Maximum Contaminant Levels (MCL) for drinking water and EPA RSLs for tapwater) on the western portion of the property. Also, coal ash and coal were found in soils on the eastern portion of the property.

The Phase II ESA completed at the **Lower Mill** found PAHs (above EPA RSLs for residential and industrial use) in surface and subsurface soils throughout the property. Metals were found in surface soils (above EPA RSLs for residential and industrial use) and in groundwater (exceeding EPA MCLs for tapwater), and perchloroethylene (PCE) and its derivatives are prevalent in groundwater (exceeding EPA MCLs). A nearby **Dump Site** on the banks of the Saluda River was once utilized by Pelzer Manufacturing and subsequent owners during a time when environmental management and 'best practices' were yet unheard of. Located north of the Upper Mill and separated from the mill property by a portion of the mill neighborhood, the former Pelzer Mill dump occupies two contiguous parcels that are separated by an active rail line. The Saluda River is being used for fishing and kayaking regularly, so many more people from the area come to launch their kayaks and fish. The Phase II ESA (using TBA funds) completed at this site in July 2011 indicated impact to surface soils (arsenic, lead, multiple PAHs) at levels that exceeded the EPA RSLs for industrial and residential use. The PHC received two EPA Brownfield Cleanup grants to install engineered caps on the dump parcels in order to transform the properties into a riverside park. Site work on the parcels is expected to begin in December.

## **1.b. Welfare, Environmental, and Public Health Impacts**

### *1.b.i. Welfare Impacts*

The Upper Mill property is bordered by low-income residential properties to the north and south. The Tabernacle Baptist Church is to the west. The Upper Mill property is vacant and overgrown with a dilapidated warehouse facility still standing on the site in addition to several debris piles from demolition activities. In this condition, the site is a hazard for the community. The site divides the communities to the north and south and neighborhood children have been seen crossing the property. The presence of brownfields – their associated problems of blight, vandalism, and vagrancy – indirectly contribute to Pelzer's crime rate, which is nearly 50% higher than the national average according to Homefacts, and a registered sex offender concentration 99.8% higher than the national average.<sup>1</sup> Local resident, Gilbert Garrett, PHC secretary, states that drug use and prostitution are flagrant in the area. The vulgar graffiti found on the walls of the old warehouse of the Upper Mill is indicative of activities that occur at this unsecured site. The Upper Mill property is a blight that decreases the value of homes and stifles investment in both housing stock and local businesses – contributing to Pelzer's economic woes.

### *1.b.ii. Cumulative Environmental Issues*

Homefacts identifies 4 brownfields, 1 State superfund site, and 12 tanks and spills in their database – giving the entry a red alert for environmental hazards.<sup>1</sup> The brownfields all have documented soil contamination above industrial and residential RSLs, and they are unsecured. Children and trespassers have easy access to the contaminated areas, especially residents/children walking in a north-south direction across the Upper Mill property. The Environmental Data Research Report obtained for the Phase I ESA conducted for the PHC in August 2013, reports six leaking underground storage tank sites in Pelzer. Most of the homes in Pelzer are mill village houses. The demographic data shows that two of every three homes in Pelzer (67.5%) were built prior to 1939. Mill village houses were typically constructed with asbestos siding and were painted with lead based paint. As a poor community, it is unlikely that substantial renovation and repair has been done to these homes, especially to the homes (low median home value, poor, and low educational attainment) nearest the brownfields properties. While repainting is likely to have occurred, peeling paint may expose lead-based paint that was originally used. Generally, asbestos siding is not addressed until the home is demolished, so deteriorating siding may cause asbestos exposure. The Pelzer community is very small, about 1.2 square miles, but its residents are impacted by these unsecured properties with known contamination exceeding industrial and residential RSLs and six leaking underground storage tanks sites. The Pelzer Mills operated for about 100 years, and it is likely that the dump was used for at least 70 years until landfill regulations were passed in South Carolina. Burning of waste was common prior to landfill regulations, and burn pits were noted during the Phase II ESA. The former dump is separated from the Upper Mill by a portion of the former mill village with about 12 homes, sandwiched between the Upper Mill and the dump. . The dump property is unfenced also and easily accessible from the streets. Asbestos and Lead Based Paint assessments were conducted in 2011 on the remaining warehouse structure at the site. Both tests found high levels of contamination and recommended remediation of contaminated materials prior to demolition. Specifically, asbestos was found in the warehouse's roofing flashing and window glazing. Lead paint was found on several surfaces of the building at levels exceeding regulatory limits.

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<sup>1</sup> Source: <https://www.homefacts.com/city/South-Carolina/Anderson-County/Pelzer.html>

### *1.b.iii. Cumulative Public Health Impacts*

PAHs were detected by the Phase II ESA conducted at the Upper Mill property exceeding residential US EPA RSLs. These observations were widespread, covering nearly all of the property. It is likely this geographic spread was the result of on-site burning and the storage of coal to power the mill facilities. PAHs generally have a low degree of acute toxicity to humans, but the chronic effect of long term exposure (the mill operated for 100 years) is cancer. PAHs have also been associated with increased incidences of lung, skin, and bladder cancers. The latest available SC DHEC Community Cancer Assessment (2010-2014) for the ZIP code including Pelzer (29669) found higher than expected incidents and mortality related to cancer than expected. There were 335 new cases of cancer in the ZIP code, while 329 were expected; and, a total of 139 deaths occurred, while only 121 were expected. IARC classifies lead as probably carcinogenic to humans, but children are especially susceptible to lead which has been confirmed in the surface soils on the Upper Mill property. Also, 67.5% of the homes in Pelzer were built prior to 1939, and 50% of the families with children in Pelzer live in poverty. Thus, the children in Pelzer are much more likely to be exposed to lead paint in their homes, since their families have not been able to afford lead paint abatement in these old homes. Studies have shown that children who have elevated levels of lead in their systems are often more inattentive, hyperactive, disorganized, and less able to follow directions in school and additional follow-up of some of those children showed higher rates of failure to graduate from high school, reading disabilities, and greater absenteeism in the final year of high school. Younger children, especially, are much more at risk to exposure due to inadvertently eating contaminated soil and peeling paint with more hand-to-mouth activity. Elevated blood lead levels measured in children is maintained by DHEC. In 2015, Anderson County, which includes Pelzer, had a high level of children under the age of 36 months and of children between 36 and 72 months tested for lead poisoning compared to other counties. The US EPA Environmental Justice Screen Tool data for Census Block Group containing the brownfields property (450070103004, population 944) confirms these findings. The tool identifies high levels for NATA Cancer Risk (in the 70-80<sup>th</sup> percentile for the nation) and Lead Paint Indicator (92<sup>th</sup> percentile in the nation and 99<sup>th</sup> percentile for the state).<sup>2</sup>

### **1.c. Financial Need**

#### *1.c.i. Economic Conditions*

The PHC is a volunteer-based nonprofit organization attempting to deal with the numerous brownfield issues. In 2016, the organization had a total revenue of just \$5,128, \$2,485 in expenses, and \$2,643 in net assets. Its principals receive no compensation. We only have our time and effort that we can give, but we are willing to work hard to see Pelzer thrive again as we once knew it. Residents and former residents – the sons and daughters of the textile mill workers – have born the burden of these properties, the decline of industry, and plant closures and now face the unfortunate legacy of environmental contamination and health impact. Now they are shouldering the burden of cleaning up these sites and redeveloping the properties with the hope of saving their community. The Town of Pelzer is a tiny community of low-income residents with extremely limited financial resources. The Town has no taxing authority. Its only source of revenue is from water supply. It does not even operate a Town Hall as of the last few months. The town's only employee is part-time and works from the West Pelzer Town Hall. Even when combined with the populations of nearby West Pelzer and Williamston, the resources of the

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<sup>2</sup> Source: <https://ejscreen.epa.gov>, Accessed October 2017

people in this rural area are well below the amount needed to tackle even one sizeable brownfields site with serious environmental contamination – let alone three of them.

#### *1.c.ii. Economic Effects of Brownfields*

The presence of these brownfield properties in Pelzer have had a significant, long-term impact on the economic prospects of the community. As the mills closed and hope for redevelopment from absentee owners dried up, the town has descended deeper into its economic troubles. Today, per capita income is extremely low - \$17,089 versus \$22,400 for Anderson County. Brownfields have negatively impacted home values (median home value of \$95,000 versus \$128,100 for Anderson County). Residents also suffer from low higher education attainment (only 8.8% have a Bachelor Degree or higher education versus 19.5% for Anderson County and 25.8% for South Carolina), a very high level of poverty for families with children (50.0% versus 21.0% for Anderson County), and a higher number of households with Food Stamp/SNAP assistance (18% versus 15% for the county).<sup>3</sup> The brownfield sites are located in the heart of the community surrounded by residential areas, blocking development along the Saluda River – a key potential asset, and near commercial sectors of town. The properties suppress investment in both commercial activities and improvements to residential properties. Two out of every three buildings in the town were constructed before 1939 (2015 ACS US Census Bureau) and most have seen little improvement.

## **2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS**

### **2.a. Project Description**

#### *2.a.i. Existing Conditions*

The Upper Mill site (13.44 acres) is located along Smythe Street and Stevenson Street in the Town of Pelzer. The site originally hosted Mill Number 4 and various support buildings. However, the majority of the mill structures were demolished and only a warehouse remains standing. The remainder of the property is vacant and overgrown with several debris piles left over from the demolition of the mills structures. The property is located in an area consisting primarily of residential properties and the Tabernacle Baptist Church. A Phase II ESA was completed by CTC Public Benefit Corporation in 2013 for the Town of Pelzer with funding from the town's US EPA Brownfields Assessment grant project. The assessment found significant levels of contamination on the property's soil, including:

- **Bis(2-chloroethyl)ether and Bis(2-chloroisopropyl)ether** – levels were observed exceeding residential US EPA RSLs throughout the property, likely from cleaning fluids used as part of the textile manufacturing operations associated with the mill.
- **Hexachlorobenzene** – levels were observed exceeding residential US EPA RSLs throughout the property, likely from chemical solvents associated with mill operations.
- **N-Nitrosodi-n-propylamine** – levels were observed exceeding residential US EPA RSLs throughout the property.
- **PAHs** – levels were observed exceeding residential US EPA RSLs throughout the property, likely from on-site burning and storage of coal to power the mill facilities.
- **Vanadium and Aluminum** – levels were observed exceeding residential US EPA RSLs in the vicinity of the former machine shop.

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<sup>3</sup> Source: 2015 ACS US Census Bureau

- **Arsenic** – levels were observed exceeding residential and industrial US EPA RSLs in high concentrations in the area of the warehouse, in the area of the former boiler house, in the former machine shop, and the retention pond.
- **Antimony** – levels were observed exceeding residential US EPA RSLs in the area of the former boiler house, likely from flame retardant materials used at that location.
- **Lead** – levels were observed exceeding residential and industrial US EPA RSLs in the vicinity of the Picker Room and Mill 4.
- **Iron** – levels were observed exceeding residential US EPA RSLs in the central and southern portions of the property near large areas of building debris.

The chief contaminants of concern are primarily the high levels of PAHs and Arsenic on the property. In addition, asbestos and lead based paint assessments conducted in 2011 found asbestos containing materials in the warehouse's roofing flashing and window glazing and lead paint on surfaces throughout the building exceeding regulatory limits.

#### *2.a.ii. Proposed Cleanup Plan*

Cardno, Inc. prepared an Analysis of Brownfields Cleanup Alternatives (ABCA) for the Upper Mill site with funding from a Brownfields Cleanup Revolving Loan Fund grant supplied by SCDHEC. PHC is the current owner of the property and is coordinating the redevelopment of the site. Based on this report, PHC intends to address the impacted soils at the site through a "Capping" solution to cover the contaminated soil areas with a combination of an engineered cap, buildings, and hard surfaces. This option allows for the redevelopment of the site with adequate protection from future exposure to site contaminants. PHC has located a private company (developer), State Investors LLC (SI), that intends to redevelop the property as a small business park that will include two warehouse/distribution buildings and a multi-tenant office building. A first tenant company has expressed interest in the site with a formal announcement expected in December. The plans anticipate that the remaining warehouse on site will be demolished. The new buildings and their associated parking areas will cover much of the contaminated area. A stormwater pond is planned, which will encapsulate contaminated soil in that area of the property. The engineered cap will cover areas not covered by the planned buildings, hard surfaces, and stormwater pond. The cap will consist of a geotextile membrane with a covering of 6" clay soil and 6" topsoil. An additional 25% of topsoil is planned for planting areas. Asbestos Containing Materials (ACM) will be removed and properly disposed at a permitted landfill prior to demolition of the old warehouse.

#### *2.a.iii. Alignment with Revitalization Plans*

The community of Pelzer has been attempting to deal with its brownfields properties for more than two decades. It was easy for the Town, its residents, its former residents, and Anderson County to see significant potential in Pelzer – the Saluda River access, its history, the number of people traveling through Pelzer on Highway 8, and its close proximity to the City of Greenville, but it has been difficult knowing where to start and how to finance the effort. Visioning sessions conducted by the US Army Corps of Engineers as a part of the Town's EPA Brownfields Assessment Grant with the community identified reuse and redevelopment options for these sites that included commercial facilities for the Upper Mill site, parks and river access on the dump parcels, and commercial and residential properties with river access on the Lower Mill. The redevelopment of the Upper Mill site will be a critical part of the overall community plan for brownfields redevelopment and economic revitalization.

The *2016 Comprehensive Plan* for Anderson County – a strong supporter of the Town of Pelzer’s efforts to redevelop its brownfield sites – recommends the encouragement of public/private partnerships throughout the county to encourage brownfield cleanup efforts (part of Recommendation 3). PHC and State Investors have entered into such a partnership with a contract for the redevelopment of the Upper and Lower Mill properties. The plan also recommends encouraging new business recruitment to the area (part of Recommendation 1). As a new business park, the Upper Mill site will host new tenant companies helping the region fulfill its long-term collective economic development goals. An announcement of the first tenant is expected in December.

The *2017 Comprehensive Plan* for the neighboring town of West Pelzer recommends working with the Town of Pelzer on joint initiatives to promote economic development. Additional employment opportunities generated by tenant companies at the Upper Mill site business park will benefit West Pelzer residents who are within a 5 minute drive from the site and Williamston residents, who are a 6-7 minute drive from Pelzer. In 2016, Pelzer and West Pelzer were awarded a Municipal Association of South Carolina Economic Development grant for the *Master Planning of Main Street* – which is located a short distance from the Upper Mill site – and to conduct an economic impact analysis. Both communities will continue to work jointly to make the Upper Mill site a success for area residents and businesses as part of their economic development strategies.

PHC is currently applying for a Master Planning Grant for Pelzer from the Appalachia Regional Commission. The plan will organize the various brownfields redevelopment efforts in conjunction with SI’s proposed work and a longer-term vision for Pelzer’s economic revitalization.

## **2.b. Task Descriptions and Budget Table**

### *2.b.i. Task Descriptions*

Grant funds will be used for Community Outreach, Cleanup Planning and Site Cleanup. Overall grant programmatic support will be provided by PHC as an in-kind contribution and a part of its match. All cost estimates are based on similar expenses incurred by PHC’s EPA cleanup grant for the Disposal areas.

**Task 1 – Project Management:** The PHC will track project tasks, schedule and budget; oversee the work of the selected brownfields cleanup contractor; and report on project activities and accomplishments to stakeholders. The project manager and/or other PHC members will also attend relevant meetings, workshops, and conferences sponsored by the EPA and/or SC DHEC. The anticipated level of effort required will be 100 hours of the project manager’s time amounting to \$2,500 in cost (\$25/hour X 100 hours = \$2,500), which will be provided as an in-kind match. Based on expenses incurred on PHC’s Disposal Area Cleanup Grants, \$5,000 is budgeted for travel to send two PHC members to the national brownfield conference and one member to the regional brownfield conference. The project management work will be accomplished by the organization’s Project Manager, PHC’s officers, and a volunteer Board member who is an attorney with support from the contractor. Outputs will include 12 Quarterly Reports, three annual Disadvantage Business Enterprise Utilization reports, three Financial Status Reports, and appropriate entries made to the ACRES database.

**Task 2 – Community Outreach:** PHC will work closely with partner organizations such as the areas local governments, the Tabernacle Baptist Church, and Palmetto Business Association – a

local economic development organization – to plan and conduct a series of stakeholder meetings for this grant effort. The organization will also distribute vital project information through local newspapers, radio and television media, postcards, and social networking platforms. The project will also coordinate a Brownfields Task Force made up of representatives of the community and the project's partner organizations. The \$15,000 budget for the contractor performing the community outreach includes:

- Developing a Community Involvement Plan (\$2,500)
- Facilitating 3-4 press events and public meetings to discuss project activities and cleanup results, specifically including a community meeting prior to cleanup start and after cleanup completion so that the community will be well informed as to what will occur on the site during cleanup, truck routes, etc. as well as the final results (\$8,500)
- Preparing and distributing project brochures, postcards and public notices (\$4,000)

A budget of \$500 in Supplies is included for the printing of the brochures and postcards. In addition, PHC will contribute 40 hours of Project Manager time to participate in and help coordinate the community meetings (\$25/hour X 40 hours = \$1,000) as in-kind match. Total cost for Task 2 – Community Outreach is \$16,500, and the work will be accomplished by contractor in conjunction with the organization's Project Manager. Outputs will include one Community Involvement Plan, three to four community stakeholder meetings, and 250 project brochures, 500 postcards, and four public notices to reach community stakeholders in Pelzer, West Pelzer, Williamston, and Anderson County.

Task 3 – Cleanup Planning: Cleanup planning will include finalizing the ABCA document to include obtaining review and approval from EPA and SCDHEC Project Managers, placing the ABCA on a 30-day public review and comment period, preparing the Quality Assurance Project Plan for confirmation soil sampling, and negotiating and receiving the necessary regulatory approvals. Cleanup planning contractor costs are anticipated to include the following:

- Finalization of ABCA document, including incorporation of comments from public notice and regulatory review (\$4,000).
- Preparation of a Quality Assurance Project Plan (QAPP), and Health and Safety Plan (HASP) (\$5,500).
- Development of bid documents (RFP) for site cleanup activities, evaluation of bids, calling references, coordination of a pre-bid onsite meeting and selection of contractors to include (\$9,500).

PHC will also contribute 20 hours of Project Manager time to review documents (\$25/hour X 20 hours = \$500) as in-kind match. Total cost for Task 3 – Cleanup Planning is \$19,500, and the work will be accomplished by subcontractors in conjunction with oversight from the organization's Project Manager. Outputs will include one ABCA, one QAPP, one HASP, and bid documents for the capping activities.

Task 4 – Site Cleanup: PHC will use the majority of the grant funds for the actual site cleanup activities. Based on the Phase II ESA of the property and the findings from the draft ABCA, contractor cleanup activities are estimated to be \$350,144 and include the following remedial activities:

- Mobilization/Demobilization and construction entrance (\$4,000).
- Crew labor (\$4,000 X 12 days = \$48,000).
- Clearing of vegetation and grading (4.7 acre X \$2,000 = \$9,400).

- Removal and proper disposal of ACM debris piles and deconstruction materials to an appropriate permitted off-site facility (\$9,820 for 14 cubic yard of ACM, inclusive of landfill disposal fees).
- Installation of silt control fences along the south boundary to prevent soil erosion (400.0 LF X \$3.50 = \$1,400).
- Placement of engineered silt cover consisting of a bright orange woven geotextile membrane ([4 man crew @ \$2,500/day X 9 days = \$23,500] + [69 rolls of geomembrane X \$207 = \$14,283] + [51 ground stake packages X \$34 = \$1,734] + [freight charge = \$950] = \$39,467)
- Provision of 1 foot of clean soil, 6" of topsoil (364 truckloads X \$350 = \$127,400) and 6" of clay (342 truckloads X \$150 = \$51,300) – includes installation of planting beds at predetermined locations in the capped areas with 256 surface square feet of loosely compacted topsoil around specimen trees and a minimum depth of 5 feet.
- Engineering, permitting, etc. (20% of direct construction costs = \$58,357).

PHC will also contribute 50 hours of Project Manager time to review documents, interface with contractor personnel performing the work and monitor progress (\$25/hour X 50 hours = \$1,250) as in-kind match. Total cost for Task 4 – Site Cleanup is \$351,394, and the work will be accomplished by contractors with oversight from PHC's Project Manager. Outputs will include one final Cleanup Report and a Certificate of Completion letter.

#### 2.b.ii. Budget Table

In summary, the total cost of project activities is estimated to be \$394,894. PHC is requesting \$200,000 in cleanup funds from the EPA, while PHC and SI will contribute \$194,894 in a mixture of in-kind contributions (210 hours of Project Manager time totaling \$5,250 and cash pledged by SI in the amount of \$189,644).

**Pelzer Upper Mill Proposed Cleanup Project Budget**

Budget Categories (programmatic costs only)	Project Tasks				Total
	Task 1 Project Management	Task 2 Community Outreach	Task 3 Cleanup Planning	Task 4 Site Cleanup Activities	
Personnel	\$2,500	\$1,000	\$500	\$1,250	\$5,250
Fringe Benefits					
Travel	\$5,000				\$5,000
Equipment					
Supplies		\$500			\$500
Contractual		\$15,000	\$19,000	\$350,144	\$384,144
Other (specify)					
<b>Total</b>	<b>\$7,500</b>	<b>\$16,500</b>	<b>\$19,500</b>	<b>\$351,394</b>	<b>\$394,894</b>
EPA Share	\$5,000	\$15,500	\$19,000	\$160,500	\$200,000
PHC Share + SI pledge	\$2,500	\$1,000	\$500	\$190,894	\$194,894

#### 2.c. Ability to Leverage

PHC has very limited assets and runs on volunteer labor; however, PHC is successfully leveraging other sources of funding to complete this cleanup and cleanups on the other mill parcels. PHC has been awarded two (2) EPA Brownfields Cleanup Grants for the Pelzer Dump Sites to put in a place a similar capping strategy and prepare the site for river access. For the Lower Mill project, PHC secured a \$250,000 SC DHEC Brownfields Revolving Loan Fund

(BRLF) cleanup loan (guaranteed by Anderson County), a \$48,000 BRLF grant for asbestos and lead based paint cleanup activities, and a \$12,000 match from Anderson County.

Source	Purpose/Role	Amount (\$)	Status
SI	Site Cleanup (beyond required \$40,000 match)	\$154,894	Secured
SC DHEC's BCRLF Loan	Site cleanup (capping) on Lower Mill	\$250,000	Secured
SC DHEC's BCRLF Grant	ACM Removal	\$48,000	Secured
Anderson County	Match for BCRLF Grant for ACM Removal	\$12,000	Secured
Anderson County	Removal of Pallets at Lower Mill	\$50,000	Secured

### 3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS

#### 3.a. Engaging the Community

PHC is the heart of the Pelzer community. It was formed by and is run by volunteers who grew up in and love Pelzer and continue to live in the area. As a community-based volunteer-run nonprofit organization, PHC grew out of a grassroots effort to see Pelzer thrive again. They took a bold step when they acquired all of the mill properties under a Voluntary Cleanup Contract with SCDHEC, but they wanted to see redevelopment of Pelzer's brownfields properties and revitalize its economy. The organization and its members are well-connected both within Pelzer's small community and with residents from the surrounding area that have an association with Pelzer and its mills. PHC will work with its partner organizations and governments to involve the community in the cleanup project activities. Grant activities will be overseen by a Brownfields Task Force comprised of representatives of the community and the project's partners. The Task Force will meet on a quarterly basis to review activities, monitor progress, and plan future events. Task Force meetings will be held at the Tabernacle Baptist Church or other suitable facilities.

PHC will work with its partners to disseminate project information and accomplishments and organize community meetings. The organization anticipates holding four or more community meetings throughout the duration of the project's period of performance. PHC will develop a Community Involvement Plan to guide outreach activities during the project. Those activities will include a pre-cleanup public meeting with community members from the target area and stakeholders to discuss the project initiative and upcoming activities. Participants will be able to provide comments on the anticipated efforts and their implementation. Activities will also include a review of the ABCA plans and recommendations, hours of operation, truck routes, site signage, and other safety measures being put in place to protect the area's sensitive young population. The meeting will allow the project team to seek out and address the concerns of local residents regarding health, safety, and community disruption from the project. PHC will also hold a post-cleanup meeting to describe the work that was completed and solicit feedback on next steps for redeveloping the property.

Communication will be facilitated through notices in local media including *The Journal* (local weekly newspaper) and local radio stations WHZT, WLTE, WJMZ, and WABB. David Meade, the editor of *The Journal* will support the project by writing articles related to the cleanup and community meetings. He has been present and written articles about every PHC community meeting relating to its brownfields projects over the last seven years, including one article about this potential brownfields cleanup project. PHC will also post notices on its social media platforms to primarily engage the youth population in the Target Area, including its own Facebook page. At the community meeting prior to submitting the application, the group decided

to start an email list for upcoming meeting notices. Notices will also be posted on the social media platforms of partner organizations and governments, including the Town of Pelzer's website.

The Town of Pelzer is a very small community and we have been implementing brownfields-related projects in the area almost a decade. During this time we have developed strong communication networks and community partnerships. The community meeting held on November 9<sup>th</sup> to discuss Upper Mill redevelopment brought out 57 community members, including the Mayors of Pelzer, West Pelzer, and Williamston. After introductions by PHC members, SI made a presentation of the commercial/light industrial redevelopment proposed for the Upper Mill site. Then, the ABCA was presented. Excitement could be felt in the room. Most attendees were not so interested in how the site would be cleaned up, but that it would be cleaned up, redeveloped, and providing jobs in Pelzer. One lady asked, "Will it happen before Christmas?" Of course, the answer was no, but SI did state that they expect an announcement of the first tenant before Christmas. On November 7<sup>th</sup>, SI issued a press release about the contract that it had entered into with PHC to lease the properties for redevelopment of the Upper and Lower Mills as well as some housing development in Pelzer. The press release helped drive the large turnout at the community meeting in such a small town. It is anticipated that the high level of community interest in the redevelopment projects combined with our broad-based community network within the nearby neighborhoods will enable us to easily and effectively disseminate critical project information such as project meeting notices and activity status updates. Specific emphasis will be placed on reaching the lower-income residential areas and sensitive young populations located near the property. PHC also intends to issue press releases with information on the project's background and history as well as environmental issues and cleanup activities.

Project announcements will be distributed through all these formal and information channels as major milestones are achieved. This will include, but not be limited to, grant award and project startup, pre-cleanup stakeholder meeting and the post-cleanup stakeholder meeting.

### **3.b. Partnerships with Government Agencies**

In anticipation of acquisition of the property, to meet the terms and conditions of a bona fide prospective purchaser, and to meet the requirements of the SC DHEC's Voluntary Cleanup Program (VCP) as a non-responsible party, the PHC, at a cost of \$2,900, had a Phase I ESA performed in August 2013 in preparation of accepting the donation of all the Pelzer Mill Properties. PHC signed Voluntary Cleanup Contract (VCC) 13-5832-NRP on November 21, 2013. This contract addresses cleanup at the Upper and Lower Mill parcels as well as the dump site. The VCC became effective on January 13, 2014. SCDHEC is the state agency responsible for environmental issues. The SCDHEC letter is included with the Cover Letter for this application. PHC will continue to report on the status of the project to SCDHEC as required by that contract, and the agency will provide regulatory oversight and serve as a technical resource for the project team during the implementation of the cleanup activities. Under the contract, SCDHEC sets the cleanup standards and issues the Certificate of Completion once the terms of the contract are satisfied.

The SCDHEC Upstate Public Health Regional Office has also provided a letter of support for the grant application. The organization will provide core statistics and other relevant data as needed and support the efforts of the Brownfields Task Force in implementing the grant program. Letter is attached.

The Towns of Pelzer, West Pelzer, and Williamston submitted letters of support for PHC's brownfields application. Anderson County also submitted a letter and offered to provide a representative to serve on the Brownfields (BF) Task Force.

### **3.c. Partnerships with Community Organizations**

#### **3.c.i. Community Organization Descriptions & Roles**

PHC will collaborate with the following community organizations for this project.

- Tabernacle Baptist Church – Located adjacent to the Upper Mill, the church will support the project by providing meeting facilities for community meetings, serving on the BF Task Force, and disseminating project information to its members in the community.
- Palmetto Business Association – An association of businesses in Pelzer, Williamston, and West Pelzer supports the effort to redevelop the Upper Mill and is providing a representative to serve on the BF Task Force.
- The Journal – The local newspaper has covered all of the community meetings to date as well as having published all public notices and solicitations. David Meade, Editor, will continue to support PHC in the efforts of this cleanup grant.

In addition, the project is supported by Mr. Wayne Fowler, a former Anderson School District One Superintendent. In this role he oversaw the implementation of over \$15 million in federal grants. On previous PHC EPA grant projects he has served on the BF Task Force and assisted in making sure the program correctly implemented the grant requirements, and he will continue those roles with this grant. Calvin Waters, CPA, treasurer of PHC with over 45 years of budgeting, finance, and accounting experience, will continue his role on the BF Task Force and manage the financial aspects of the grant. Another former and future Brownfields Task Force member is Mr. Gilbert Garrett – a long-time Pelzer resident who provides information technology support to PHC and its brownfields activities. Westley Cox, Esquire, current BF Task Force member who has provided numerous hours of legal work pro bono, will continue his role on the BF Task Force to see redevelopment of the former mill properties. Tice Welborn, a professional geologist who spent summers of his youth with his grandparents in Pelzer, will continue his work on the BF Task Force providing technical assistance on the cleanup work.

#### **3.c.ii. Letters of Commitment**

Letters of commitment for each of the organizations identified in Section 3.c.i are included as an attachment to this proposal. No subawards will be made to community organizations.

### **3.d. Partnerships with Workforce Development Programs**

There are no current EPA Brownfields Job Training grantees in South Carolina. However, Rick Cothran, Dean of Corporate and Community Education, Tri-County Technical College (TTC- the technical school that serves Anderson County) states that they offer HAZWOPER, asbestos survey, inspector, and abatement training. WorkLink Workforce Development Board (WDB) is the regional agency linking employers and employees in Anderson County. PHC with the assistance of Anderson County will connect potential employers to TTC and WDB to assist with staffing needs, as well as work with its consultant to provide subcontracting and procurement opportunities to local firms when feasible.

## **4. PROJECT BENEFITS**

### **4.a. Welfare, Environmental, and Public Health Benefits**

The Upper Mill site has significant environmental issues and there is evidence the operations on the property have had a negative long-term impact on residents in adjacent neighborhoods. These

neighborhoods have high concentrations of the elderly and young children – populations particularly sensitive to these environmental issues. Cleaning up the property will protect these vulnerable populations from future harm associated with the asbestos, lead based paint, PAHs, and arsenic present at the site. Property blight may also had a negative impact on property values (which are substantially lower than the county average), lack of community investment, and business recruitment efforts. The area may also be a habit for the Northern Longhair Bat – a vulnerable species that is known to live nearby. Cleaning up the site will protect wildlife and reduce the possibility of contamination reaching the nearby Saluda River.

**Anticipated Welfare, Environmental and Public Health Benefits**

<b>Area</b>	<b>Anticipated Benefit</b>	<b>Community Need Addressed</b>
Welfare	Removal of blight	Expanded economic potential and residential investment
	Development of a business park	Increased local employment and water revenue
Environmental	Removing sources of contamination	Protect wildlife and nearby Saluda River
	Capping soil contamination	Preventing further contaminant migration
Public Health	Capping soil contamination	Protect future site users and nearby residents, particularly neighborhood children, from hazardous sources of contamination

**4.b. Economic and Community Benefits**

The primary benefits anticipated by this project are economic. The site will be reused as a business park that will contain two warehouse/distribution buildings and a multi-tenant office building. This site will provide vital economic development for this very small community by creating vital job opportunities for residents and increase the tax base. A developer has already been identified and one tenant company has expressed interest in locating to the property. The developer has expressed that getting the funding from the EPA and our leveraged sources for cleanup, is vital for this project to move forward. He can only commit to the project if he can start with a “clean” site that is ready to build. The initial tenant expects to employ 30 people initially and expand to 50 jobs. The developer anticipates the full site will support 300 new jobs for the community. For a rural area, this will be a huge boost for the economy.

**5. Programmatic Capability and Past Performance**

**5.a. Audit Findings**

PHC has not received adverse audit findings. The last audit was performed in August 2017.

**5.b. Programmatic Capability**

PHC has the requisite capacity to administer the EPA grant funds based on its previous experience managing two EPA Brownfield Cleanup Grant projects. Mr. Larry Coker, Vice President of PHC, will serve as the Project Director. Mr. Coker is a Vietnam veteran who retired after 42 years as a job training instructor at Cryovac. Mr. Coker is the Project Director for the two current EPA Brownfield Cleanup Grants. Mr. Calvin Walters, CPA, and member of the Board of Directors of the PHC will serve on the Brownfields Task Force and assist with financial grant management as needed. In addition, PHC utilizes the services of a qualified contractor to complete the cleanup planning and community outreach tasks and oversee cleanup activities. PHC has already procured a contractor in full compliance with state and new federal guidelines, 2 C.F.R. 200 and EPA’s rule at 2 C.F.R. 1500. Therefore, the project team will be prepared to begin work upon grant award. Upon the SC DHEC approval of the final cap design, remediation contractors will be procured through a Request for Proposals (RFP) in accordance with the federal guidelines. All procurements will be advertised in the local newspapers and include those who express interest in the work to the PHC.

### **5.c. Measuring Environmental Results: Anticipated Outputs/Outcomes**

The following key performance measures and outcomes will be tracked for this project:

- Number of acres of contaminated soil capped.
- Number of acres made ready for reuse as business park facilities.
- Number of participants involved in community meetings and planning activities as documented on meeting sign-in sheets.
- Number of tenant companies signing firm commitments to locate in the business park.
- Number of jobs planned by tenant companies selecting the site.
- Amount of dollars leveraged in cleanup and redevelopment.

All performance measures will be reported in the quarterly reports and the online ACRES database.

### **5.d. Past Performance and Accomplishments**

#### *5.d.i. Prior EPA Brownfields Assistance Grants*

PHC has previously received \$400,000 in EPA Brownfields Cleanup Grant funds for cleanup of the 16.8-acre Eastern Parcel and 11.8-acre Western Parcel of the Pelzer Mill Dump. . The grants are being managed under a single, combined cooperative agreement (BF-00D33415-0).

Accomplishments: PHC has convened the Brownfields Task Force on a regular basis and conducted outreach to the community members per our outreach plan. Because of the uniqueness of these sites in terms of redevelopment and limited resources, several high level meetings were held between SCDHEC, PHC, and PHC's consultant to prepare for the cleanup. SCDHEC involvement included not only the brownfields group but also the landfill group. This coordination caused several delays and the necessity of modifying the schedule. SCDHEC required a very specific survey of the disposal area sites prior to reviewing revised ABCAs. After revisions, the ABCAs were approved by SC DHEC, cultural resource and protected species surveys were performed, a stormwater permit application was submitted, and RFPs for capping the two disposal areas were submitted to eight cleanup contractors and advertised in the local newspaper, *The Journal*, on September 14, 2017. A site visit was held with those companies on September 28<sup>th</sup>. After final selection, project work will begin over the winter and be completed within 90 days, before end of the grant period. Since the consultant has been providing a substantial amount of pro bono work to stretch the grant dollars, and the subcontractor has not been selected to actually start the capping work on the sites, only \$32,907.82 of the grant funding has been expended to date. In addition to the activities listed above, these funds were spent on attending brownfields conferences and making a presentation at the Southeastern Brownfields Conference in Jacksonville last year.

Compliance with Grant Requirements: PHC has complied with the EPA approved work plan, its modified schedule, and the terms and conditions of its cooperative agreement. PHC has completed all required quarterly progress reports, MBE/WBE utilization forms, and annual financial status reports on time. Using these grant funds, PHC has achieved the expected results of the grant to date.

# Application for Federal Assistance SF-424

**\* 1. Type of Submission:**

- ☒ Preapplication  
☐ Application  
☐ Changed/Corrected Application

**\* 2. Type of Application:**

- ☒ New  
☐ Continuation  
☐ Revision

**\* If Revision, select appropriate letter(s):**

**\* Other (Specify):**

**\* 3. Date Received:**

11/15/2017

**4. Applicant Identifier:**

**5a. Federal Entity Identifier:**

**5b. Federal Award Identifier:**

**State Use Only:**

**6. Date Received by State:**

**7. State Application Identifier:**

**8. APPLICANT INFORMATION:**

**\* a. Legal Name:**

Pelzer Heritage Commission

**\* b. Employer/Taxpayer Identification Number (EIN/TIN):**

273304573

**\* c. Organizational DUNS:**

9692488840000

**d. Address:**

**\* Street1:**

PO Box 627

**Street2:**

**\* City:**

Pelzer

**County/Parish:**

**\* State:**

SC: South Carolina

**Province:**

**\* Country:**

USA: UNITED STATES

**\* Zip / Postal Code:**

296690000

**e. Organizational Unit:**

**Department Name:**

**Division Name:**

**f. Name and contact information of person to be contacted on matters involving this application:**

**Prefix:**

Mr.

**\* First Name:**

Larry

**Middle Name:**

**\* Last Name:**

Coker

**Suffix:**

**Title:**

Member

**Organizational Affiliation:**

**\* Telephone Number:**

864-243-9120

**Fax Number:**

**\* Email:**

lcoker8@att.net

## Application for Federal Assistance SF-424

### \* 9. Type of Applicant 1: Select Applicant Type:

M: Nonprofit with 501C3 IRS Status (Other than Institution of Higher Education)

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

\* Other (specify):

### \* 10. Name of Federal Agency:

Environmental Protection Agency

### 11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

### \* 12. Funding Opportunity Number:

EPA-OLEM-OBLR-17-09

\* Title:

FY18 GUIDELINES FOR BROWNFIELDS CLEANUP GRANTS

### 13. Competition Identification Number:

Title:

### 14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

### \* 15. Descriptive Title of Applicant's Project:

Brownfields Cleanup Project for Pelzer Upper Mill

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

**Application for Federal Assistance SF-424****16. Congressional Districts Of:**

\* a. Applicant SC-03

\* b. Program/Project SC-03

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

**17. Proposed Project:**

\* a. Start Date: 10/01/2018

\* b. End Date: 09/30/2021

**18. Estimated Funding (\$):**

* a. Federal	200,000.00
* b. Applicant	40,000.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	240,000.00

**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**☐ a. This application was made available to the State under the Executive Order 12372 Process for review on ☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.☒ c. Program is not covered by E.O. 12372.**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix: Mr.

\* First Name: Larry

Middle Name: 

\* Last Name: Coker

Suffix: 

\* Title: Member

\* Telephone Number: 864-243-9120

Fax Number: 

\* Email: lcoker8@att.net

\* Signature of Authorized Representative: Larry Coker

\* Date Signed: 11/15/2017